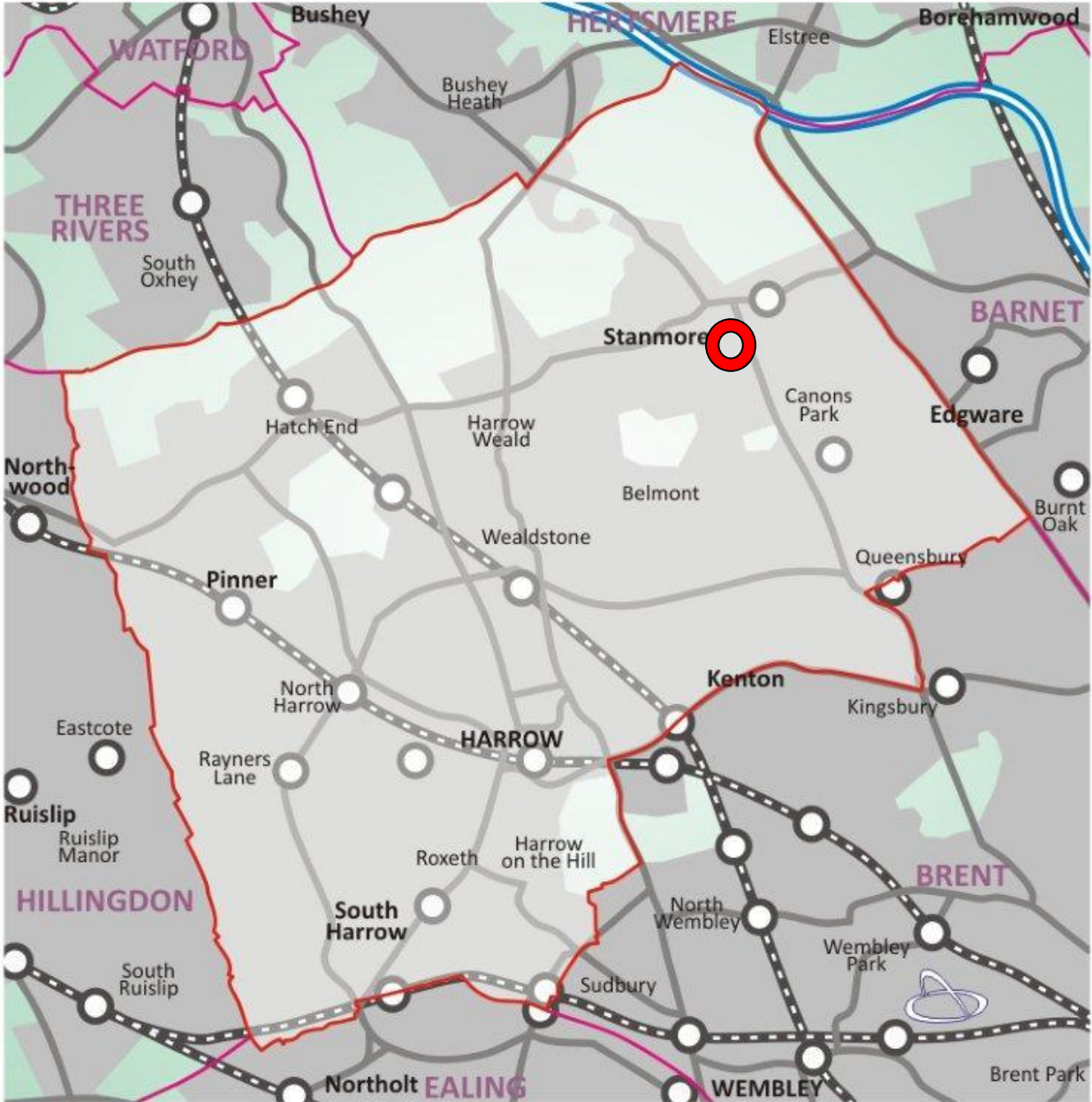
 = application site



<b>Stanmore College, Elm Park Stanmore, HA7 4BQ</b>	<b>P/0201/23</b>
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## Location Plan



# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

4<sup>th</sup> January 2024

**APPLICATION NUMBER:** PL/0201/23  
**VALID DATE:** 4<sup>th</sup> JANUARY 2024  
**LOCATION:** STANMORE COLLEGE, ELM PARK, HARROW,  
STANMORE  
**WARD:** STANMORE  
**POSTCODE:** HA7 4BQ  
**APPLICANT:** C/O (BOUYGUES)  
**AGENT:** MONTAGU  
**CASE OFFICER:** NICOLA RANKIN  
**EXPIRY DATE:** 15<sup>th</sup> JANUARY 2024 EOT: 31<sup>st</sup> JANUARY 2024

### PROPOSAL

Phased demolition of six existing buildings on site and phased construction of five linked building blocks upto four storeys in height to provide new educational facilities (Use Class F1(a)) ancillary facilities, car parking, cycle parking, servicing, landscaping and associated works

### RECOMMENDATION A

The Planning Committee is asked to:

- 1) agree the reasons for approval and the conditions as set out this report in appendix 1; and
- 2) Delegate authority to the Chief Planning Officer in consultation with the Director of Legal and Governance Services for the continued negotiation and completion of the Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement.

The Section 106 Agreement Heads of Terms would cover the following matters:

- a) **Community Use agreement** to be agreed and implemented to include details of:
  - Arrangements for ongoing consultation with residents and other local stakeholders (should normally include at least one public meeting per annum following the occupation of the new development);
  - Date by which the facility has to / is allowed to be completed, opened or made available to the public

- Proposed arrangements for liaison between the facility, the development, residents and/or the Council;
  - Times at which the facility will be open to the public if there is a gate or door which can prevent public access;
  - Arrangements for times when the facility is closed;
  - Other community access arrangements (e.g. location of entrances etc);
  - Pricing policy (e.g. rents at which a community meeting room which can be hired is made available);
  - How and by whom a facility will be managed (including making arrangements for cleaning, hiring etc.);
  - Where (on what websites, publications etc.and how a facility will be advertised (e.g. length of advertisement period);
  - How it is anticipated that a facility will be occupied (e.g. target local community groups) and what types of activities will be likely to take place (including implications for noise, transport etc.);
  - How a facility will complement existing services or activity in the locality;
  - How a facility will be staffed (on-site / off-site, by whom, at what times etc.);
  - Arrangements for how any changes in the above arrangements will be managed; and
  - Arrangements for the regular review of the plan
- b) **College Operational Management Plan** to be agreed and implemented to include:
- Details of staggered start/finish times and number of students. Arrival of students at the site to be no more than 900 at 9am
  - A maximum of 1400 students to be on site at any time.
  - Arrangements for monitoring attendance by students and submission of annual records of attendance to the Council or upon the Council's request following completion of the development.
  - Arrangements for ongoing consultation with residents and other local stakeholders
  - Proposed arrangements for liaison between the college, residents and/or the Council to manage any reported incidents/issues that arise from student accessing the site and how this will be managed/addressed.
  - Arrangements for how any changes in the above arrangements will be managed; and
  - Arrangements for the regular review of the plan
- c) **Transport and Highways**
- A financial contribution of £10,000 towards CPZ investigation work. Should the CPZ investigation identify necessary mitigation is required, the applicant shall make a further financial contribution of £30,000 towards extension/amendments of the CPZs surrounding the site.
  - To secure a Travel Plan and arrangements for the effective implementation, monitoring and management of the travel plan for the site.
  - A financial contribution of £35,000 towards bus stop improvements

d) **Employment and Training** to include:

- The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan which shall provide a named training and employment co-ordinator. The training and employment plan shall include monthly monitoring returns to be agreed prior to start on site. The developer to implement the agreed Plan.
- In the event that that the developer is unable to provide an employment and training plan to the satisfaction of the Council's Economic Development Department, a financial contribution of up to £41, 250 to be paid by the developer to fund local employment and training programmes.
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

e) **Decentralised Energy Networks:**

- The developer to safeguard a route to be agreed with the Council to enable a connection to any future district decentralised energy network.

f) **Biodiversity**

- The proposal shall deliver a minimum of 20% biodiversity net gain against the baseline valuation (once agreed), which should include appropriate provision of trees with scope to achieve large size to be delivered off site

Prior to the commencement of any work above DPC level, the applicant shall:

- Discuss, and agree with the Local Planning Authority in writing, the baseline and post-development biodiversity unit value of the proposed development, taking account of the feasibility of biodiverse green roof provision and ground level habitat creation and enhancement within the red line area(s)
- Identify practicable measures incorporating offsite elements as appropriate to address loss of large trees and, beyond this, to achieve the balance of the required biodiversity gain via onsite delivery
- Provide to the Council for approval in writing, a Biodiversity Gain Plan and a proportionate Biodiversity Mitigation, Enhancement, Management and Monitoring Plan (BMEMP), setting out full details of
- the onsite habitat creation and enhancement measures,
- wildlife shelter provision, incorporating a minimum of 20 durable bat (6), bird (10) and invertebrate (4) shelters, (of which 8 of the bird shelters should be double cavity swift boxes), with these to be incorporated within the fabric of the new buildings in suitable locations - or such alternative provision as may subsequently be agreed in writing with the Council
- how and where the identified measures are to be implemented
- the management required to achieved target condition

- monitoring and reporting to be undertaken by suitably qualified ecologists against identified milestones over the first 5 years and at 5-yearly intervals thereafter over a minimum period of thirty years,
  - the implementation and, at 5-yearly intervals, the updating of the BMEMMP
  - Finalise details of any financial contribution and its application that may be required in order to fund such rectification works as the Council may be required to undertake to address the failure of the mitigation or gain measures within the site to achieve the value to which the applicants have committed themselves or any separate off-setting measures as are agreed;
- g) **Legal Costs, Administration and Monitoring:**
- A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

## **REASON FOR THE RECOMMENDATION**

The NPPF (December 2023) requires that Local planning authorities give great weight to the need to create, expand or later schools through the preparation of plans and decision on applications (paragraph 99(a)). In addition, paragraph 100 states: "To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities". The proposed education needs of the school and benefits of the proposal have been robustly demonstrated in the Education Needs Assessment and other supporting documents. Subject to conditions, the proposals would have an acceptable impact on the character and appearance of the area and would ensure high quality buildings are delivered. Subject to conditions and obligations, the proposal would not unduly impact on the amenities of neighbouring residents and would comply with all relevant policy considerations relating to highway safety, tree protection, accessibility, ecology and biodiversity and sustainability.

The decision to grant planning permission has been taken having regard to national planning policy, the policies of The London Plan 2021, the Harrow Core Strategy and the Harrow Development Management polices Local Plan (listed in the Informatives), as well as to all relevant material considerations including any responses to consultation,

## **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 31<sup>st</sup> January 2024 (or such period as the Council may determine) of the date of the Committee decision on this application, then it is recommended to delegate the decision to **REFUSE** planning permission to the Chief Planning Officer on the grounds that:

The proposed development, in the absence of a section 106 agreement to secure necessary agreement and commitments in relation to the development would fail to mitigate the impact of the development on the biodiversity value of the site and provide sufficient biodiversity net gain, would fail to provide sufficient contribution to sustainable travel, community benefit and local training and employment and would cause harm to the residential amenities of neighbouring occupiers, contrary to the National Planning Policy Framework (2023), London Plan 2021 policies, D3 7, S3, G6, G7, T1, T2, Harrow Core Strategy 2012 policies CS1 E and R, Harrow Development Management Policies Local Plan (2013) policies DM1, DM 42, DM43, DM46 and DM50 and the Supplementary Planning Document: Planning Obligations and Affordable Housing (2013).

## **INFORMATION**

This application is reported to Planning Committee as it is a major development. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a) – 1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type: Major Development  
Council Interest: None  
Net additional Floorspace: 11, 045 sq.m

GLA Community  
Infrastructure Levy (CIL): £0 Exempt  
Contribution (provisional):  
Local CIL requirement: £0 Exempt

## **HUMAN RIGHTS ACT**

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

## **EQUALITIES**

In determining this planning application, the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

## **S17 CRIME & DISORDER ACT**

Policy D11 of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. The application has been referred to the Secure by Design Officer who has recommended a condition be attached to any future permission to ensure Secure by Design accreditation is achieved. Accordingly, a condition is attached for security matters to be addressed at each phase of the development to address the above policy requirements.



## 1.0 **SITE DESCRIPTION**

- 1.1 The application site is situated to the south of Stanmore and has a site area of approximately 1.22 hectares.



Figure 1: Site Location Plan

- 1.2 The application site boundary is illustrated by the red line above as well as some land in the same ownership of the college that is outside of the application boundary edged in blue.
- 1.3 The site currently comprises of the existing Stanmore College which is a further education college providing academic and vocational courses to young people and adults.
- 1.4 The College has almost 2, 731 students, comprising of 1,550 16-18-year olds and 1,181 19+ learners. The site also has 169 staff (98 teaching and 71 non-teaching).
- 1.5 The Stanmore College site is made up of a collection of nine buildings, ranging in height from one to three storeys high. The three buildings in the southwestern corner of the site, located within the blue line above, are more recent additions to Stanmore College and are not proposed for redevelopment. The remaining six buildings sit within the redline application boundary.
- 1.6 The application site is situated within a residential area, comprising predominantly two storey semi detached and detached dwellings with some four storey blocks of flats located to the west on the other side of Old Church Lane. There is also a part two storey/part three storey block of flats located to the east at the junction with Elm Park and the Ridgeway.

- 1.7 Beyond the northern boundary of the application site, are residential dwellings located within the Manor House Estate and fronting Elm Park. No's 15/16 are a pair of semi-detached dwellings and their rear gardens directly abut the northern site boundary. No. 86 Elm Park and its rear garden runs along the northern boundary at the north eastern corner.
- 1.8 To the north west of the northern boundary is a wooded area which is protected by a Tree Preservation Order (No. 865 and group G8). The western, southern and eastern boundaries of the application site are also bounded by Tree Preservation Orders (TPO No 944 and Groups G1, G2 and G3).
- 1.9 The Old Church Lane Conservation Area is situated to the north west of the application site. A small section of the conservation area adjoins the northern boundary.
- 1.10 Two storey semi-detached dwellings fronting Elm Park are approximately 18.5 metres from the application eastern boundary. Two storey detached dwellings along the Ridgeway are separated by a distance of approximately 18 to 21 metres from the southern side boundary.
- 1.11 The main existing pedestrian entrance for students into the site is from Old Church Lane on the west of the site and main vehicular access to the site is from Elm Park to the northern car park. There is an additional vehicular access on Elm Park to small area of parking on the eastern boundary. The existing car park to the north of the site contains 82 spaces.
- 1.12 The site is located within an Archaeological Priority Area.
- 1.13 The site is located within Flood Zone 1 but has a small localised surface water flooding area on the western side of the site (surface water flood zone 3a)
- 1.14 The site has a Public Transport Accessibility Level of 1(b) (with 6 being the highest and 1 the lowest) and is therefore considered to be of low accessibility. Stanmore Station is located approximately 0.8 miles to the north east of the site and is serviced by the Jubilee Underground line. The site benefits from a bus stop, immediately outside on Old Church Lane, which provides services to Elstree and Brent Cross.

## **2.0 PROPOSAL**

2.1 The proposal seeks planning permission for the following:

- Phased demolition of six of the existing buildings and associated structures.
- Construction of a new building of 11,045sqm for pupils aged 16+ containing teaching and study areas, wet and dry labs, dining and assembly halls, a sports hall, support spaces, new SEND teaching space and ancillary community spaces.
- Creation of a new secured central courtyard that will create a cohesive campus.

- New hard and soft landscaping, including trees, hedgerows, social spaces and security fencing.
  - New public spaces, including student entrances.
    - 82 car parking spaces, including 5 disabled spaces and 14 EV parking spaces.
  - 200 cycle parking spaces, including 158 long stay spaces for students, 24 long stay spaces for staff and 18 short stay spaces for visitors.
- 2.2 This application seeks full planning permission for the phased demolition and redevelopment of Stanmore College to provide a new 11,045sqm building, formed of five interlocked blocks (as shown in figure 2 below), to provide new and improved teaching facilities.
- 2.3 The proposed development results in increasing the number of pupils aged 16-18 to circa 1,840 and students aged 19+ increasing to 1,690, thereby representing an increase of 290 and 509 respectively. Staff numbers will also increase to approximately 230 (120 teaching and 110 nonteaching).
- 2.4 The proposal is focused around a central courtyard, which each of the five interconnected blocks fronts onto, to create a new cohesive campus for Stanmore College. All five blocks will have direct access onto the new central courtyard as well as the three retained buildings within the blue line boundary.
- 2.5 The mass of the new proposed building will be broken down into five interconnected blocks. The five blocks range from 3 to 4 storeys high and represent the five key areas of the college - the four teaching zones and the shared resource area.
- 2.6 Blocks A, B and C in the north of the Site will comprises three of the four teaching zones - Science, Technology, Engineering and Mathematics (STEM); Childcare, Healthcare and Education (CHE) and Business and Finance (BCSCAM). These blocks will each have a similar mass and appearance to one another.
- 2.7 Blocks A and B, will be four storeys high (16 metres) and these have been located in the north-west corner of the site where the ground is lower from the surrounding context. Block C will be three storeys high (12.3 metres).

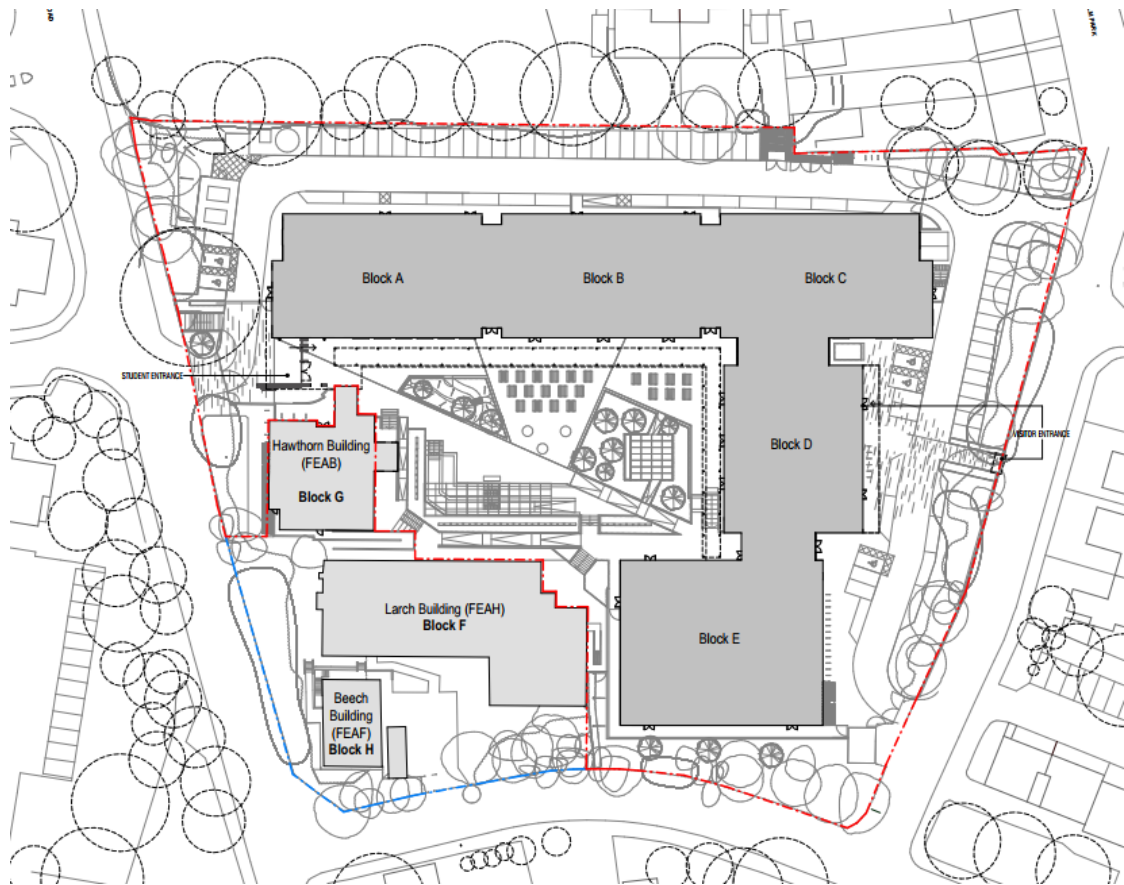


Figure 2 Proposed Site Plan

2.8 The central hub, Block D, will contain the shared spaces for the college, and has been designed to be the new public face of the college. This block will provide a new main entrance into Stanmore College for visitors and a secondary entrance for pupils. Block E, located in the southeast corner of the site, will provide the new sports block and represents the fourth teaching zone. Blocks D and E will each be three storeys high.

Block A (STEM) – 4 Storeys

2.9 Block A contains the STEM teaching facilities, with the ground floor comprising of technical lab spaces. The first floor will provide practical spaces such as sustainability and ICT labs. Science occupies the second floor of Block A, alongside an Energy Innovation lab where students will be taught how to work with technologies such as batteries, solar panels and electrical motors. The third floor then makes up the A-Level science labs, with some closed and open seminar spaces.

Block B (CHE) – 3 storeys

2.10 The ground floor of Block B contains the main dining hall, which has been specifically designed to be a multi-functional space that opens up to the courtyard when required for events. Covered external canopies will provide areas for external dining. Childcare, nursing and health care will then be located on the first floor, with

games development and digital design on the second floor. The third floor is where the college's Special Educational Needs and Disability (SEND) provision is located and provides contained spaces for foundation learning and life skills. The applicant has outlined that the SEND provision has been carefully located on the third floor to provide a quiet, secluded area of the college for students with extra educational needs, yet within an area that still has good connectivity to the rest of the campus.

#### Block C (BCSCAM) – 3 storeys

- 2.11 Student services are located at the ground floor of Block C, close to the main entrance of the College. Business and finance labs where pupils will be able to work with local businesses to develop their education will be located on the first floor and second floor.

#### Block D– 3 storeys (Shared Resource Area)

- 2.12 Block D is the Central Hub of Stanmore College and provides the main entrance for visitors accessing the college. In addition to the reception, the ground floor also contains a café area. Block D contains the shared student spaces on the first and second floor and is made up of ITC suites, seminar rooms and a learning resource centre.

#### Block E (Sports Block) – 3 storeys

- 2.13 The sports hall and changing facilities are located on the ground floor of Block E, alongside a reception office for the community entrance. The gym will be located on the first floor of the Sports Block and the second floor will contain a fitness suite and two seminar rooms.

#### Landscaping and Central Courtyard

- 2.14 The new central courtyard is the visual focus for each of the new blocks and each block will have direct access to the courtyard. The courtyard will be sub divided into four areas:
- 1) Amphitheatre;
  - 2) Outdoor Classroom;
  - 3) Dining; and
  - 4) Rain Garden.
- 2.15 The landscape proposals will also include above-ground sustainable drainage which will reduce flood risk, the integration of PV solar panels on canopies, as well as the hidden Ground Source Heat pump boreholes and drainage attenuation tanks. There will also be the addition of "Bio Solar" roofs, a combination of a green roof and PV solar panels.

### Car and Cycle Parking

- 2.16 The proposed development seeks to deliver a total of 82 car parking spaces to serve the staff at Stanmore College. The provision of 82 car parking spaces includes 5 disabled parking spaces and 14 electric vehicle spaces.
- 2.17 The scheme will also deliver a total of 200 cycle parking spaces. The provision of 200 cycle spaces will comprise of 158 long stay spaces for pupils / students, 24 long stay spaces for staff and 18 short stay spaces for visitors. These spaces are located across the Site, as shown on the submitted Landscape Proposed Site Plan (Ref. FF0011-NVB-SW-XX-DDR-L-1100).

### Access and Servicing

- 2.18 The main student pedestrian entrance into Stanmore College is accessed via Old Church Lane to the west of the site. The new visitor and secondary student entrance is through the Central Hub. A community entrance is also located between blocks D and E to provide access to the sports hall.
- 2.19 The existing vehicular access to the north-east of the site onto Elm Park Road will be retained and will continue to provide the main vehicle access into and out of the site. The existing vehicle access to the south-east will be reconfigured to allow egress only onto Elm Park, through the creation of a new one-way loop connecting the northern car park to the south-eastern corner. The shared vehicle and pedestrian access onto Old Church Lane will be restricted to pedestrian access only, however still allowing vehicle egress manoeuvres in the event of an emergency.
- 2.20 All servicing and refuse collection will take place on-site, with access and egress taken from Elm Park via the main vehicle access.
- 2.21 The proposal includes provision for a secure waste and recycling store located within the secure car park in the north of the site.

### Community Access

- 2.22 The proposals also include an element of community access. A community café is being provided, which is located on the ground floor of the central hub (Block D). A small kitchen will be located in the café.
- 2.23 The sports block (Block E) will also operate as a community facility and is secured off from the rest of the College outside normal school hours. This area will include a four-court sports hall, a gymnasium and a fitness suite, as well as changing facilities. A reception office will also be located at ground floor level to check members of the public in.
- 2.24 Other areas of the College have been designated for out of hours community use, including the lecture theatre and the dining hall.

### 3.0 **RELEVANT PLANNING HISTORY**

3.1 A summary of the relevant planning application history is set out in the table below:

<b>Reference</b>	<b>Description</b>	<b>Decision</b>
P/2684/23	EIA Screening Opinion to determine whether an Environmental Impact Assessment is required for severable phases for the demolition of existing building and structures and severable phases for re-development to provide new educational facilities (Use Class F1(a)); ancillary facilities, car parking, cycle parking, servicing, landscaping improvements and associated works	EIA not required. Decision Issued: 16 <sup>th</sup> October 2023
P/0280/21	Temporary single storey portacabin to be used for additional nursery space (Use class F1(a))	Granted 26-Mar-2021
P//3391/13	Variation of condition 2 (approved plans) attached to planning permission p/1663/13 dated 11/09/2013 for the alteration of the siting of the buildings northern staircase; increase in the building height by 426mm; a single storey extension to the eastern elevation and alterations to the fenestration including the window sill level and window heights.	Granted 08-Jan-2014
P/1663/13	Construction of a three-storey linked building to the west of the site, adjacent to old church lane to provide a gym and ancillary facilities at ground floor level and four additional teaching classrooms at first and second floor level; new non illuminated signage to front (western) elevation; hard and soft landscaping; provision of cycle storage railings and boundary treatment; (demolition of existing single storey mobile building on western side of the site (hawthorn mobile building) and part demolition of single storey hall building and external canopies)	Granted 11-Sep-2013

P/0439/13	Temporary retention of two storey building (spruce building) fronting elm park for a period of 36 months	Granted 12-July-2013
P/0210/12	First floor extension to southern end of elm building incorporating workshop space beneath extension; proposed external works to elm building to include: - new access ramp to existing staff/student entrance; - raised platform and steps with canopy on western elevation; - formation of new visitor entrance including new staircase, timber portal and canopy; - new cladding and canopy to lift shaft; - installation of metallic skin to part of eastern and western elevations; - part new glazing; and - proposed hard surfacing and external seating area.	Granted 21-May 2012
P/0854/10	Demolition of caretakers house; construction of two storey building containing four classrooms and ancillary accommodation	Granted 20-Jul-2010
P/1659/08COU	Outline: redevelopment to provide new two to four storey building along with indoor sports and recreational facilities, internal roads and footpaths, access and parking, and ancillary facilities	Granted 24-Aug-2015
P/474/05/DFU	Replacement of 'beech' building with 2 storey theatre workshop	Granted 19-Apr-2005
P/622/04/CFU	Removal of 3 temporary buildings and replacement with single temporary building to provide 5 teaching rooms.	Granted 24-May 2004
P/1829/03/CFU	Two storey front extensions in the form of three linked pavilions	Granted 19-Jan-2004

#### **4.0 CONSULTATION**

- 4.1 A total of 426 consultation letters were sent to neighbouring properties regarding this application.
- 4.2 The public consultation period expired on 30<sup>th</sup> November 2023. A total of 34 representations were received, comprising 29 objections, 2 supports and 2 neutral comments.



4.3 The proposal was advertised for the following reasons:

- Press Advert: Major Development /Impact on Setting of a Conservation Area  
Expiry: 7<sup>th</sup> December 2023
- Site Notice: Major Development / Impact on Setting of a Conservation Area  
Expiry: 6<sup>th</sup> December 2023

4.4 A summary of the neighbour consultation responses are set out below:

#### Traffic and Parking

- If the intention is to allow more students, more parking spaces etc. then there is already too much of both.
- The area cannot also cope with the amount of building traffic that will be created in the area.
- The Council recently put in parking zones into the area around the existing college and this has pushed students and teachers to park in the surrounding roads which means that local residents cannot park their cars easily.
- There is not enough public transport in the area.
- Will parking be provided onsite as the area is already congested with residents having issues.
- This will have an adverse impact on the residents of the road on access, parking and with noise and pollution from vehicles.
- I am also concerned about the safety of pedestrians and cars. The road is narrow and not designed as a main road. It can already get noisy during the day due to some students and recently double yellow lines were introduced outside my house and part of the street. Whilst these can be an inconvenience occasionally, I personally welcomed them from a safety aspect as in the 3 years of living here I have witnessed a number of accidents / near misses on the corner of Nelson Road / Elm Park.
- Additionally, I believe this entrance will cause traffic and access issues for road users at busy times and I do not believe that the road is of sufficient capacity to cope with the increased traffic and will lead to even more safety issues.

#### Character

- The redevelopment of Stanmore College is a monstrous 4 floor high building in a residential area near the greenbelt.
- The aesthetic of Stanmore has changed negatively, moving away from a village atmosphere. This proposed design will result in a more urban environment.
- The building itself is not adding anything to the area. It is not an attractive looking plan.
- The trees which are being felled provide cover for the buildings and are a lot nicer to look at than building blocks up to 4 storeys high.

## Amenity

- Specifically moving the entrance to Elm Park from Old Church Lane. One of the primary concerns is the potential increase in noise levels due to student activities. Our community takes pride in its tranquillity, and I fear that the proposed college expansion may disrupt the calm atmosphere we currently enjoy.
- Preserving the cleanliness of our neighbourhood is essential for both aesthetic and environmental reasons. Any negative impact on this front would not only affect the visual appeal of our community but also contribute to a decline in overall quality of life.
- The most serious issue relates to the proposed reinstatement of the college entrance in Elm Park. This was moved from Elm Park to Old Church Lane, following numerous complaints from Elm Park residents concerning the disruption caused by students and the vast amount of litter. The move to Church Road was the successful result of a lengthy campaign by the residents. They strongly objected to the then existing access/egress entrance in Elm Park.
- The local area does not have the capacity for this. There is already an ongoing issue in relation to students parking their vehicles on private property, anti-social behaviour from students, littering, smoking and drugs, noise, trespassing onto private property and the students being a general nuisance in the area.
- My understanding of the plans are that the college facilities are to be open to the local community (such as myself) to utilise. If this means usage after business hours then the plans for the vehicular entrance / exit on Elm Park (a small, residential side street) will be even more disruptive to residents and local community and change the character of the road from being a residential street to a busy thoroughfare.
- There have been ongoing issues with pest control including rats from the college (rubbish bins overflowing etc...) into the nearby properties - I ask that consideration is given to the location or to the build to ensure it is rodent proof and sufficient and appropriate bins are provided to students.
- I am pleased to see the plan includes planting a boundary of trees between the college boundary and the house and garden for 86 Elm Park as I believe this will also give privacy and provide some greenery for the whole row of terraced houses.
- The proposal for a 4-story extension exacerbates existing concerns. Our neighbourhood is currently grappling with the challenges posed by the school's current facilities, and an expansion of this magnitude is likely to compound the problems rather than address them.
- We will have 3 years of building work which will probably start at 8am -if not before - 6 days a week.
- The plans for a new gym and coffee bar - open to the public - will ensure that there will not be any respite from even more traffic in the vicinity!
- I am concerned with a dedicated sports centre with the proposed opening hours too late in the evening and throughout the week and year. The proposed sports centre would eliminate any peace at weekends and holidays.
- Concerns with disruption from construction traffic.

## Other

- Bernays Gardens to close partially because of the vandalism from the students. They shout, have fights and present themselves as a nuisance in the local shopping centres such as Sainsbury.
- The college has changed entrance in Elm Park. Moving anti social behaviour to old church lane area. Vandalism, littering drug dealing.
- Crime rates and antisocial behaviour will rise.
- Additionally, I am concerned about the potential for increased litter resulting from a higher number of students in the area.
- Properties are being devalued as a result on anti-social behaviour from students.
- The proposed replacement building is not an environmentally positive way forward.

## Statutory and Non-Statutory Consultation

- 4.5 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

Consultee and Summary of Comments
<p><b>LBH Landscape Officer:</b> No objection, subject to conditions</p> <p>The proposals for Stanmore College have been developed in consultation with Stanmore College, the DfE, the local community and key stakeholders. The proposals were the subject of pre application discussions with the London Borough of Harrow. The discussions included trees, landscaping, and biodiversity amongst all the other aspects. High quality and inclusive design were encouraged. The landscape proposals have, in the main, incorporated the landscape recommendations. The visual setting of the building relies heavily on the retention of the existing trees and shrubs around the perimeter of the site, with some additional new underplanting. The amalgamation of the outside space into one large courtyard rather than the disjointed and smaller existing amenity and courtyard spaces has resulted in a more welcoming and visually attractive landscape setting for the new building. The new courtyard provides an amenity space that is larger, attractive, functional, inclusive, and easily accessible and provides a higher quality space for students, staff, and the community to enjoy. The proposed landscape strategy has reduced the areas of 'left-over spaces' between the buildings and maximises the sense of space in the courtyard. High-quality boundary treatments, focusing on the various site entrances are welcomed since this is the element which most affects the surrounding roads, residents, and the character of the wider area.</p> <p>The proposed development provides a high quality landscape strategy across the site in the available space adjacent to the building blocks. The landscape proposals for the site are welcomed and subject to further details would satisfy</p>

the Harrow Development Management Local Plan (2013) Policy DM 22: Trees and Landscaping.

Mitigation is required for trees removed from the site and it is noted that some of the trees removed from the periphery of the site are more substantial mature trees. The new trees need to be suitable species and planted in the right place. There appears to be insufficient space for all the mitigation tree planting that would be required. A S106 legal agreement for offsite new tree planting in the public realm should enable adequate mitigation.

**LBH Arboricultural Officer:** Objection

In summary the latest proposals are much improved but I cannot support the loss of TPO trees which provide a valuable (and the only) natural screen

This site relies on its mature perimeter trees for screening. The college has lost almost all its internal trees over the years to facilitate various extensions / new buildings. TPO 934 was served in part, to address this and to prevent further unnecessary trees losses, since these boundary trees now represent the only remaining natural screening. These would be further eroded under the development proposals, which I cannot really support. It says consultation was done with the community which is positive obviously, but I would question whether they were extensively consulted on the prospect of further tree losses.

29 x trees are proposed for removal, this includes four B grade (and TPOd). There should be a presumption towards retaining such trees on development sites, as per DM22 and as per BS5837: 2012 guidance. As such the loss of 4 x B grade (TPO) trees here is unacceptable, as is the loss of TPO trees. The college might be missing the point slightly over the purpose of a TPO: whilst it is not to stop development completely, it is to ensure that trees of note are taken into account in development.

34 new trees are proposed to mitigate the loss, this is slightly more than the number being removed, but the species being proposed – small, short-lived, ornamental trees and in small sizes (80-10cm – 12-14cm) are not substitutes for larger canopy trees such as ash, lime, oak. It would be necessary to make provision for substantial off-site tree planting with large canopy species at ratio of at least 2 to 1, in order to mitigate. Some hornbeams are proposed: these are a good choice but bear in mind the fastigate hornbeams often spread out and become less narrow in form as they mature, so these may need more frequent management / pruning.

**LBH Urban Design Officer:** No objection in principle but further information required

**Site Strategy**

- The rationalisation of buildings on site is supported and the spatial strategy for clustering buildings around a central courtyard is logical.
- additional green screening and buffer treatment to this boundary to better conceal the new building is highly encouraged.

- The emerging phasing strategy proposes locating site offices against the northern site boundary adjoining rear gardens of Nos. 15 and 16 Manor House Estate. This is poor and would likely create disturbance and perceived overlooking. The Applicant should relocate this office away from neighbouring dwellings.
- Parking spaces which are directly south of Nos. 15 and 16 Manor House Estate should be relocated to another part of the site to create a planted zone along the boundary to better screen the site from Nos. 15 and 16 Manor House Estate.
- The proposed access strategy (fire tender, refuse, parking) for the development is supported, with a main vehicular entrance to Elm Park and a turning head and exit-only at the western end of the site.
- The proposed gate line is supported and associated fob control access points.

#### **Massing, Scale & Built Form**

- While daylight and sunlight impacts from Block B to Nos. 15 and 16 Manor House Estate exist, this results in habitable room windows falling very marginally below BRE standards. This is considered to be acceptable and most noticeable during winter months.
- Overbearing impacts to these dwellings from the proposed development to these dwellings is not considered to be of concern, however actual and perceived overlooking is. Fritted or obscured glazed windows to the upper storeys of Block B north elevation must be employed.
- No objection to building height.
- The massing as proposed is supported given its minimal impacts on both the character of the area and upon the nearby Conservation Area, as well as minimal overbearing, overlooking and overshadowing impact.

#### **Layout, Aspect & Orientation**

- The internal ground floor plan seems to work well and the arrangement of dining hall and courtyard is supported.
- The concept for having glazed corners to the ground floor of blocks A and B to make internal activities visible to passers-by is supported.
- There are no concerns with the internal arrangement of second and third floors, bar issues raised regarding aspect and overlooking from the north elevation.
- The interior design of the café could be more vibrant and less sterile, given that this may be used by visitors or members of the public
- The enlarged location of the refuse store is questioned, given its location next to rear garden boundaries. The Applicant is encouraged to propose an integral refuse store as part of the main building, and one which is not close to surrounding dwellings.

#### **Public Realm & Landscaping**

- The landscape strategy for the areas which adjoin the boundary are generally supported. However, there is a concern the central courtyard space are overly complicated.
- PV panel canopies is of concern, as these are considered unsightly.
- The shared surface areas to the western student entrance and eastern cycle and visitor entrance are supported.

#### **External Appearance, Composition & Material Use**

- Proposed light colour cement fibre board panels are not supported for external cladding to blocks. These have a high tendency to stain to panel joins and around fixings. An alternate material choice is requested and natural, robust external cladding materials highly encouraged.
- The proposed external copper-coloured cladding material to the Hub building is supported
- In other respects, the ground floor brick plinth surrounding all other blocks is supported.
- The dark fibre cement board cladding to Block E is supportable, providing that fixings are concealed and are not visible.
- Site entrances and gateline canopies are considered to be distinct.
- PV panel canopies are considered to be unsightly and wholly detract from the appearance of the central courtyard. These should be omitted or comprehensively revised.

#### **Sustainability & Environmental Considerations**

- The use of SuDS provision within the central courtyard is supported.
- The use of rooftop-mounted PVs to flat roofs is supported. It would be preferable for courtyard-located PV panels to also be located at roof level to remove unsightly plant from the courtyard.

**LBH Building Control:** Section 7.2.7 Disabled means of escape states that the proposed means of escape does not meet policy D5 B(5) of the London Plan. The intention to evacuate disabled persons on evacuation chairs does not meet the requirement for a dignified means of escape.

**LBH Leisure and Culture Department:** The Sports and Leisure Department would be supportive of the 4 courts in the new sports hall as current demand for sports halls in Harrow is high and exceeds accessible supply. It would be helpful to know what sports the courts would be intended to be used for? Is the new development replacing any existing sports facilities?

#### **LBH Conservation Officer:** Objection

The heritage statement refers to other heritage assets nearby but assesses the proposal only in relation to the conservation area.

We requested at pre-application stage a zone of theoretical visibility to understand this. This has not been provided. However, from the information provided it appears the proposal will impact just the conservation area and (less strongly) the setting of the locally listed Orme Lodge

The proposed block A and surrounding area on the north-west of the development site which is nearest the Conservation Area, will impact the character and appearance of the Old Church Lane Conservation Area.

The special character and appearance of the conservation area relates to the soft village, open and informal character of the area as well as the relatively small

scale of development within it at no more than 2 stories. Surrounding development helps to preserve its setting given the soft informal boundary treatments, openness, greenery, trees and scale of development being confined to two or three stories.

The proposal as it stands would harm the setting of the conservation area given the scale and siting of block A (being set quite far forward versus the main building existing on this site which is presently set further back) and the associated loss of soft landscaping (three trees) on this corner and replacement of the soft fencing with hard, urban metal railing also at this north-west corner. Some soft landscaping on the west street elevation and on the north elevation would help to mitigate the impact by providing some screening. Appeals have held that the softening impact of soft landscaping cannot be taken as a permanent feature as it may die back for whatever reason. The removal of the small 'temporary' buildings on this corner would help but still the new block A would be more prominent.

#### Recommendations

The harm will need to be avoided where it can be, and if harm cannot be avoided this requires clear and convincing justification and needs to be outweighed by public benefits to comply with the NPPF requirements. So:

- As noted at the pre-application stage, ideally the height should be reduced by one storey on block A.
- Ideally no loss of trees on the west boundary.
- If the above two points are not met, clear and convincing justification is needed and this harm needs to be outweighed by public benefits. It is noted that the heritage statement does not acknowledge harm to the setting of the conservation area and so does not provide this clear and convincing justification.
- Regardless of the above:
- The finish proposed for block A needs to change to blend in. There is concern with the grey finish shown which would stand out more than is necessary and would not mitigate the impact or blend in. It would not weather well and would give rise to staining making it stand out further. It should be amended to the timber cladding type shown on the existing block to the south adjacent block A to better blend in with the soft informal character of the setting of the heritage asset.
- The railings proposed as the front boundary treatment needs to be amended back to fencing to better blend in with the soft informal character of the setting of the heritage asset.

#### **Conservation Area Advisory Committee: Objection**

Whilst the Stanmore College campus only meets the Old Church Lane CA at the NW corner of its' site, it is highly visible from the southern section of the CA at the junction of Old Church Lane with Gordon Avenue.

Ideally, three-storey rather than four-storey in north-west corner of the site as adjacent to the Old Church Lane Conservation Area as development will become quite visible during winter months.

Trees may not stay in place forever and cannot be treated as permanent. Even though this only borders on a corner, without the trees this would be very visible and this proposal would not keep the conservation area looking as it does. The front trees that they are proposing to remove would open up the development from the road could they be kept and worked around? Or reduce the number removed? These have TPO order on them.

Even with the trees in full leaf the new buildings will be visible resulting a solid backdrop behind the boundary trees and loss of sky.

The established trees along the length of the Old Church Lane boundary of the campus is an extension of a similar tree line along this boundary within the CA. It is an important feature both to views out of the CA and the local area generally, creating a green southerly vista out of the CA down Old Church Lane between Gordon Avenue and The Ridgeway. It is proposed to remove two poplars at G04 at the Old Church Lane entrance, together with T28, T29, and G05. Removal must be fully justified and if agreed, semi-mature replacements should be provided. All trees along this boundary should be protected for the duration of the project.

The proposals as they stand will detract from the character of the CA.

**LBH Drainage Authority:** No objection, subject to conditions.

**LBH Biodiversity Officer:**

- (1) The applicants need to provide their Biodiversity Metric spreadsheet
- (2) (a) the UGF calculator/table for the proposed development seems to be missing, (b) the UGF for the existing site appears to have been completed incorrectly, particularly with regard to existing habitat well-established trees and the pond that is to be retained. This would appear to under value what's currently present
- (3) The Planning Statement gives the area of the development site as 1.22 ha, with the SW corner of the college which won't be included in the development not included in the red line. However, I note that that the pre-development UGF calculation figure indicates a much larger area (1.47 ha). What we need are figures for the area(s) that will actually be involved in the development, whether on or off site.
- (4) With regard to this, I note that the table below also includes 47m<sup>2</sup> outside of the college's ownership. Is this for an existing or new S.278 agreement (I assume notification/agreement has been sorted if the latter) and has it been included in the red line? This will be relevant to BNG calculations.
- (5) And for the note attached to the table – bell moth???



- (6) A very simple Phase 1 type summary of onsite habitat was undertaken as part of the PEA. Whilst this is generally fine as an outline of a site's habitats and their distribution as part of an initial appraisal, it isn't adequate to the purpose of assessing a site's baseline habitat value. Comparing what's actually on the ground with the baseline habitat map shows that what's been submitted isn't acceptable. A more detailed baseline evaluation will be required.
- (7) I don't agree with the characterisation of the lines of trees around the site's margin as native hedge with trees with wider areas of modified grassland. These are more lines/bands of trees with a mix other things below.
- (8) It would appear that the ecological consultant has used the entirety of building footprint to measure the extent of the green roofs. This is an overestimate that takes no account of the parapet edges and features of the roof that won't be 'green-covered'.
- (9) The landscaping proposals appear to include areas outside the redline
- (10) Strategic Significance valuations have been misapplied.
- (11) Taking account of these points, it's not possible to accept the BNG figures as presented and I suspect that what's proposed won't actually achieve 20%.
- (12) Although, the proposals make much of the intention to deliver high quality landscaping, it does appear that there are opportunities for the provision of green walls in some locations which would contribute to the biodiversity value and UGF as well as making some areas less stark than the extensive hard surfacing and plain walls indicated by the imagery.
- (13) The proposed quantum of wildlife shelter provision for a development of this scale is insufficient and we would be expecting the majority of these to be permanently built-in to the new structures, looking particularly to strengthen the swift colony centred on Nelson Road.

**LBH Planning Policy (Energy and Sustainability):** No Objection.

The overall energy strategy and outcomes are acceptable; compliance with the strategy should form a condition on any permission. A planning obligation should be secured by way of section 106 agreement to safeguard future connection of the development to a district heat network should one become available.

**LBH Highways Authority:** No objection, subject to mitigation measures being secured.

I have reviewed the information provided in the Transport Assessment in relation to potential parking impact. The report does not seem to include analysis of possible impact associated with student parking demand, therefore, I have taken a snapshot of the roads that were surveyed to determine the activity that is currently taking place and looking towards the future when the site is occupied. The parking survey results indicate that zone B1 is operating successfully with plenty of capacity for parking throughout the day (students will not be able to park here between 10am and 2pm); zone B (close to the college) shows that there is an increase in demand around the start of the college day which then reduces when the zone becomes operational at 3pm – this suggests

that the parking taking place there is likely to be associated with the College; the unrestricted streets close to the college have some capacity. My concern is that this development has the potential to generate a demand for additional on-street car parking – whilst this is unlikely to exceed the capacity of the total area surveyed, it is likely that it will significantly impact a localised area close to the college that is unrestricted and the remaining parts of zone B.

On this basis, the Highways Authority consider that a contribution towards further analysis post occupation would be required in the sum of £10,000. Should surveys demonstrate that the extension of the existing CPZ(s) or changes to the operational hours of existing zones are a required as a direct consequence of the development, a further contribution of £30,000 would be required.

A Construction Environmental Management Plan has been submitted. A standalone Detailed Construction Logistics Plan should have been submitted to the CLOCS standard. This can be conditioned.

The Cycle storage provision is acceptable. Cycle storage should be close proximity to entrances to all buildings. Supporting facilities should be recommended such as lockers and showers. Short Stay cycle spaces should be provided 15 metres of the entrance where possible.

The Delivery and Servicing Plan is acceptable.

Reviewing the documents there are 81no. car parking spaces not 82no. The discrepancy is on the South - East of the site, where 3no. bays have labelled as 4no including the disabled bay.

No Community Use document has been observed.

**LBH Travel Plan Officer:** PTAL level is 'poor' for this site. There are a number of bus services to the site which run regularly.

Targets – Targets over the five years are clear. It is great to see targets set for staff and pupils.

STARS – This has now been re-named to 'Travel for Life'. A commitment must be made to ensure the college work with the team at Harrow to work towards accreditation. Accreditation of at least Bronze level should be achieved in Year 1 of the travel plan, Silver by year 3 and Gold level by year 5. Please update Action plan with a commitment to achieving Travel for Life Accreditations as listed above.

Cycle Parking – Great to see additional cycle parking provision. Please clarify if cycle parking will be provided by the developers as part of the expansion, If not, how will the additional spaces be funded?

Good action plan however within the Action Plan it would be good to see some events to raise awareness for active travel.

Waste and deliveries – There is no mention of waste and deliveries. It would be good to understand of this will co-exist with school pick up and drop off times to ensure the safety of pupils, parents and staff.

**LBH Environmental Health:** No objection on air quality/construction management. No objection on noise impact, subject to conditions.

Having reviewed the document-Air Quality Baseline Assessment, the Construction are accepted in relation to the Impact of Construction Activities, subject to the applicant must implement and monitor the mitigation measures outlined in pages 22 & 23 as recommended. Further more, the consultant advised that the Proposed Development is considered Air Quality Neutral.

With regard to Non-Road Mobile Machinery (NRMM): I suggest that if the site is in the development zone for NRMM so we will also need to add a condition about meeting emission standards for all non-road mobile machinery.

Building design will mitigate noise and activities are not changing. Therefore, to ensure that the proposed redevelopment does not give rise to noise nuisance to the neighbouring residents as well as to the future inhabitants/users of the built premises, I recommended to granted with suitable noise conditions that the recommendation of the noise report have been adhered to.

**With regards to noise from plants,** the Consultants advised that given that noise levels from the proposed plant items are not finalised at this stage in the design. A detailed plant assessment will be undertaken as the design develops to fully inform attenuation measures expected to be required to achieve the proposed limits. **Therefore, we need to see their detailed plant noise assessment.**

**NB: RE: External Lighting: within their document, Design & Access Statement Part2** , noted that the external lighting shall be designed and installed according to the School Output Specification Technical Annex 2E, ILP Guidance Note 01/21, BS 5489-1-2020, and BS 8300-2-2018. The luminaires shall use high efficiency LED lamps. The luminaires will be selected and positioned to minimise causing nuisance to neighbouring properties. The external lighting shall be controlled by a photocell and timeclock in series. Therefore, to comply with, I suggest to put a condition.

**LBH Economic Development:** We would want local residents to have access to (some of the) construction jobs that are available as part of the construction of the college.

This would be secured through a s106 agreement that requires:

- (i) a training and employment plan that will be agreed between the council and the developer prior to start on site and
- (ii) a financial contribution towards the management and delivery of the construction training programme based on the build cost of the development. This is usually charged based on a formula of £2500 per £1m build cost.

**Historic England:** On the basis of the information available to date, we do not wish to offer any comments.

**Designing Out Crime Officer:** No Objection, subject to a Secure by Design condition.

I have looked at the submitted plans and the only concerns I have currently is the access control, separating the students and student areas and the proposed community use. With a priority to ensuring that community users cannot hide weapons or drugs within the college grounds for students to access. This can be achieved with a fine level of detail and discussions throughout the build and procurement processes.

The plans for the venue can achieve a Secured BY Design award, if constructed as advised following the Secured By Design Schools, and Commercial guides. I do advise the developers to work closely with SBD to ensure a safer and securer college is constructed.

**Greater London Archaeological Advisory Service (GLAAS):** No objection, Recommend No Archaeological Requirement

**MOD Safeguarding:** No objections.

**Environment Agency:** No response received.

**Thames Water:** No response received.

**Elm Park Residents Association:** Objection

1. History of the site - This site was occupied by two bungalows with large gardens. In the 1960s Harrow Council took down a gated road closure that existed at the Southern end of Elm Park and opened it up to through traffic to The Ridgeway. No doubt the plans for a 6th form college on the site of the two bungalows was well underway before it was built in the 1970s. Residents were informed that a maximum of 500 sixth form students without cars would attend the College and the current parking provision is still based on those numbers. Over the years we have seen the College expand and expand, first to "Tertiary" and opened to the wider population, particularly those who drive cars.
2. Student numbers. We currently have around 3,000 students, not the 500 originally promised. Those 500 students came in the morning and went home in the afternoons all at the same time. They did not go off site at any time during the day and so were not visible. All school holidays were quiet without any disturbance. There is also a nursery on site which is accessed from The Ridgeway and has many vehicles arriving and collecting children. The cars park right on the corners of the junctions. The part-time students also park in the available areas in the surrounding streets wherever the parking restrictions allow. We will cover this more later. Meanwhile the

- College has gone from single and double storeys to, now applying to put up a wall of buildings 3 and 4 storey high.
3. Character of the Area. The effect on the Character of the Area has been truly appalling. What was once a quiet and accessible residential area has now become noisy with not only students shouting and screaming as they go up and down the roads but they have or attract people in fast cars that speed and cause noise and safety issues. There is often a "boom" box being carried around by students on foot. Walking to the shops during the times when the students are going to and from the College (and at lunch times) is truly unpleasant. They are shoulder to shoulder and many deep on the footways and people feel intimidated and frightened with such numbers when they come near them. Added to current problems will be the additional need to have to avoid speeding cycles on the footways with hundreds proposed for the new development. Although how many will cycle from Brent and across London, the catchment areas, is yet to be seen! The language is appalling, the refuse constantly dropped everywhere is shocking and the fumes from the smoked drugs are horrendous.
  4. Impact from the proposals. The impact from these proposals needs to be broken down into a number of areas:-
    - A. The number of students we have always been told to be around 3,000 in recent years. Around 1300 full-time and the rest are part time. The ones that come in the evenings park right outside residential homes around the College and prevent residents parking. They cause noise, disturbance and drop litter from their vehicles most days.
    - B. We note the gross internal floor space will increase from 7195 sq mtrs to 11,045 sq mtrs! And yet we are told there will be no increase in student numbers even with the building space increasing by 50%! This is accompanied by teaching staff numbers, currently at 183 increasing to 262 and yet we are told there will be no increase in student capacity yet again! This is obviously not the case. A 50% increase in space and teaching staff equates to a 50% increase in student numbers in reality, that is 4,500 possible students. Add to that the fact that the facilities are to be "opened up" in the evenings and all weekend to outside events and one can see this is a wolf in sheep's clothing.
    - C. There is a question in the planning application "Does the proposal involve loss or gain of non-permanent dwellings" to which a response has been inserted as "NO".  
This is not the case. Bordering Elm Park are 3 portacabins that we were informed would be put in as "Temporary" buildings and their continued use is still "Temporary"! We have not seen any application to have these buildings made permanent and why would we when they were put up whilst a block was being rebuilt previously on site. The problem remains in that, contrary to promises, the portacabins have never been taken away and so the College expanded, yet again, without planning permission for permanent use. Those portacabins do not form a part of the existing footprint and we believe they have been taken into the 7195 sq m existing floor space calculation erroneously.
    - D. The Impact on the surrounding Conservation Area and The Manor House Estate will be huge! The size and scale of the buildings on the

northern end of the site will be visible for all to see, not just from the Conservation Area. The tallest block is on the North West corner with Old Church Lane (almost at the top of the ridge) and is proposed to be 17.5 metres in height! This is scandalous. The other blocks are not a lot better - Block B is 16 metres, Block E 13.5m and blocks C and D 13.4m, all visible above the tree lines and from street views. We object to this Industrial Scale development being proposed in a totally residential area where the impact will be disastrous on all residents' daily lives, seven days a week including evenings.

- E. This proposal will have a terrible and detrimental impact in terms of its scale, massing and dominating effect on the whole area, as well as the Conservation Area. It will overlook many properties and will seriously compromise privacy, windows serving habitable rooms at the top end of Elm Park in particular. The College was and is now even more so "inappropriate development" sitting within a totally residential area.
  - F. We have seen no bat, bird, tree or reptile reports and it would be surprising if the former were not present in some of the older buildings. Perhaps we have overlooked the documents?
5. Highway Safety. There are huge highway safety issues. Strangely, before the planning application has been approved or commented on, there has been a traffic plan "consultation" which we knew nothing about until the very last minute. It has now closed to any further comment. We have seen a proposal for widening the footpaths and a pedestrian crossing on Old Church Lane. We asked for evidence of how this proposal came into being, i.e., traffic surveys, etc., in order to formulate a proposal. We were told that no traffic surveys had taken place and that Council staff had visited the College one day to reach their conclusions! How can such an impactful proposal on the locality be formulated without being informed as to the effects it will have? The queues of traffic in all directions will cause huge pollution and traffic chaos in this high volume road for traffic. When we went to the College rebuild Consultation we suggested a "pull in" area being constructed for the 324 bus in order to allow the traffic to flow. Apparently they have ignored our suggestion as there are problems with "the levels" of the ground to do this. With billions of pounds of investment proposed, we believe that traffic works should be paid for by the Government, not we, the local taxpayers through our Council Tax. The majority of these students are "out of Borough"! Why has Stanmore been targeted to take them from all over London and for Harrow to pick up the bill?
6. Access and Egress. In respect of the proposed access and egress of both pedestrians as well as vehicles to the site from Elm Park we object most strongly. That up to 4,500 students and hundreds of teaching staff and deliveries will now all access and egress from the Elm Park northern access point, just by a blind bend in one direction and yards from a junction at the other, is highly dangerous! The previous Principal took Health and Safety regarding pedestrians and vehicles very seriously. There was a well considered approach to comply with best practice, i.e., not to have pedestrians and vehicles all accessing and egressing from the same point and to separate the two. This has avoided serious injury to students. Now we see the proposal to ignore student safety and to allow vehicles access and egress all around them, including deliveries! Simply appalling to see

this retrograde step. It is against Health and Safety and will heavily impact Elm Park and the whole area. Even the large construction vehicles are proposed to come in and out from the pedestrian access on Elm Park, this is untenable.

7. Crime and disorder. As we have record crime now (with 63 police reports for this immediate area of Stanmore in September alone) we do not see how up to a possible 50% increase in students will lessen the issues we already have. Daily there is shoplifting in Sainsburys and most of that goes unchecked and unreported. The report of 63 crimes are the tip of the iceberg. When residents have contacted the College we have been advised that once the students are out of the College environs they are not the College's responsibility! On Fridays in particular it is "queue up for smoking cannabis day" and there are a number of dealers that come to the area particularly at lunchtime. One resident happened to be in their garden one Friday a few weeks ago and the smell from smoking was going on for some considerable time as numbers went past. We object to our residential area being subjected to this activity and preventing us from enjoying our homes and environs free from noise, pollution. Our Human Rights are being exploited by this proposal.

We ask the Planning Committee to REFUSE this grossly excessive planning application for all the reasons given.

## **5.0 POLICIES**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

'If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.'

- 5.2 The Government has issued the National Planning Policy Framework [NPPF 2023] sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of this application.
- 5.3 In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

## **6.0 ASSESSMENT**

- 6.1 The main issues are:

- Principle of Development
- Character and Appearance of the Area and Impact on Heritage Assets

- Residential Amenity
- Traffic, Safety and Parking
- Biodiversity
- Air Quality and Contaminated Land
- Drainage and Flood Risk
- Energy and Sustainability
- Accessibility and Fire Safety
- Equalities Implications
- S17 Crime & Disorder

## **6.2 Principle of Development**

6.2.1 The relevant policies are:

- National Planning Policy Framework (December 2023)
- The London Plan 2021: S1, S3, S5, G3
- Harrow Core Strategy 2012: CS1 F, Z
- Harrow Development Management Policies Local Plan (2013) DM 47, DM46, DM48

### Background to Site Development

6.2.2 The Department for Education (DfE) have selected 17 further education colleges across the UK for redevelopment as part of the Capital Transformation Fund programme. Stanmore College is the only further education college in London to have been selected. The DfE concluded in their assessment that the college has inadequate facilities to enable the college to deliver the aspirational educational curriculum as several of the buildings date back to the 1960s and are no longer fit for purpose.

6.2.3 The DfE funding programme targets End of Life buildings which are suitable for heavy refurbishment or to be demolished and replaced with new and improved buildings. As outlined, the existing facilities at Stanmore College are no longer fit for purpose and as a result, the ability of the College to continue to deliver its standard of teaching is being undermined. Consequently, Stanmore College is the largest recipient of funding of the Capital Transformation Fund.

6.2.4 The College is also seeking to expand and diversify its range of courses with the addition of T-Levels, which will be facilitated through the redevelopment of the site. The proposals also intend to create flexibility of the spaces to ensure longevity of the College and ensure it can continue to respond to future changes in education.

6.2.5 The new facilities will provide places for 3,530 students through vocational studies for 16-19 year-olds and vocational delivery for adult learners.

### Education Need

6.2.6 Proposals for new educational facilities, particularly in areas of need are supported in policy S3 of the London Plan (2021). Furthermore, paragraph 99 of the NPPF (Dec 2023) states that local planning authorities should take a proactive, positive



and collaborate approach to meeting the needs of existing communities and to development that will widen choice in education.

6.2.7 The application is accompanied by a detailed needs assessment. The report identifies a number of issues with the existing site. The existing college buildings date back to the 1960s and are outlined to be well beyond their economic life. The buildings have poor insulation creating poor condition for students in the colder winter months. Moreover, surveys have indicated the presence of asbestos and the current college site is not DDA compatible. There are also a number of longstanding temporary building on the site. A summary of the key issues with the current site are identified as follows:

- Outside classrooms
- Very limited circulation/ social spaces for learners and staff
- Poor heating – leading to higher energy usage
- Inadequate accessibility for all learners
- Poor Wi-Fi and aging IT network services
- Limited sports and enrichment facilities for learners/ local community
- Classrooms are inflexible for teaching new curriculum due to their construction
- Limited expansion for new curriculum needs that meets the local skills shortages

6.2.8 As outlined above, the College were able to engage with the DfE Capital Transformation programme. Following further investigation and surveys undertaken by the DfE, Stanmore college was gauged as having one of the poorest campuses in the UK and is failing to meet modern educational standards. As a result, the college was selected for a 60-million-pound investment to transform learning opportunities for 16 to 18 year olds and 19+ learners by offering modern teaching and learning environments and creating an amazing college. The proposed redevelopment opportunities are summarised as follows:

- receive high quality teaching and learning in state-of-the-art facilities
- receive a broad spectrum of curriculum in the areas of skills shortages for the North West London
- be able to receive courses for gas, electric installation, digital and AI programmes, in addition to health and social care and STEM subjects
- enjoy modern classrooms and labs for T-level qualifications
- to experience new facilities including a new lecture, student canteen & café, a student garden, 4 court sports hall and fitness facilities
- enjoy quality teaching and learning facilities/ environments with the latest industry standard equipment
- enjoy added value by improving skills and lives of learners and allowing them to progress onto higher skilled employment
- improve their well-being by participating in College courses or using our new community facilities
- enjoy curriculum that meets the local (Harrow Skills), regional mayoral and national skills agenda

- enjoy the facilities with other educational institutions, including local schools and colleges in new and exciting collaborative approaches e.g. open days/ teaching with schools and cross delivery to employers with other FE colleges.
- Enhanced community facilities for all

6.2.9 The identified needs and education benefits are extensive. The proposals will facilitate provision of further courses and will provide enhanced learning in science, technology, Engineering and Mathematics (STEM), Childcare, Healthcare and Education (CHE), Business and Finance (BCSCAM) and Special, Educational Needs and Disability provision (SEND) and provide increased teaching space for a greater number of students. Officers consider that the college's need for the additional facilities which would unlock the latent potential for approximately 530 extra college places has been strongly demonstrated. As such, officer's consider substantial weight can be attributed to the educational need at the site.

6.2.10 Both the London Plan (policy S3) and DMP policy DM 47 require educational facilities to be located in accessible locations with good public transport accessibility. As noted above, the site has a low PTAL rating, however, given this is a long-established educational institution, other material benefits are considered to outweigh any conflict with this aspect of the policy. Moreover, improvements to site accessibility can be secured through a Travel Plan.

#### Community Benefit

6.2.11 Both London Plan Policy S3 and local plan policy DM47 supports new educational/sports facilities subject to provision of community access to the facilities provided.

6.2.12 The accompanying planning statement outlines that currently local residents are encouraged to use their facilities both during and after the operational hours of the college. As part of the proposals, the applicant seeks to expand its existing commitment outlining that the development of the site will present new opportunities that allow for greater engagement and facilities for the local community. Facilities that the community would have access to include a café, a four courts sports hall, gymnasium and fitness suite, lecture theatre and dining hall.

6.2.13 The applicant has not outlined the specific details of how the local community could make use of the resources, how many patrons could benefit and specific hours of use outside of college operational hours. The college have indicated the sports hall could be used for a range of uses including Basketball, football, indoor tennis, volleyball, cricket, badminton and handball. It is considered that the community benefits of the proposal could be secured through a section 106 agreement in the form of a community use agreement which would enable full details of community access to be agreed. This would also include details in relation to the practical arrangements including how the proposal would be managed, promoted and whether there would be any fees involved.

#### Conclusion

6.2.14 The proposed education needs of the college and benefits of the proposal have been robustly demonstrated in the Education Needs Assessment. Subject to a section 106 agreement to secure the community benefits of the scheme, the application is considered to comply with the above policy requirements and is considered acceptable in principle.

### **6.3 Character and Appearance of the Area and Impact on Heritage Assets**

6.3.1 The relevant considerations are:

- National Planning Policy Framework (2023)
- Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990
- The London Plan 2021: D1, D2, D3, D4, D12 HC1
- Harrow Core Strategy 2012: CS1 B, D
- Harrow Development Management Policies Local Plan (2013): DM1, DM6, DM7

#### Impact on Heritage Assets

6.3.2 This application is accompanied by a Heritage and Visual Assessment, prepared by Montagu Evans, which considers the proposals in relation to relevant policy as well as the impact on the special significance of nearby heritage assets, including the nearby Old Church Lane Conservation Area, listed and locally listed buildings.

#### Significance

6.3.3 This proposal is in the setting of the Old Church Lane Conservation Area and is within an Archaeological Priority Area. It is also in the setting of the locally listed 4 Gordon Avenue. There are listed buildings in the conservation area and depending on the size of this proposal this might also impact on the setting of some of these.

6.3.4 The special character and appearance of the conservation area is outlined by the Old Church Lane Conservation Area Appraisal and Management Strategy which states:

‘The special interest of the Old Church Lane Conservation Area relates to its unusual mix of very old buildings and 1930s development in an "Old-World" style which successfully attempts to mimic the historic buildings around it. These buildings are complemented by the surrounding open spaces and greenery. Whilst there has been some more recent development and the area is close to the hustle and bustle of Stanmore town centre, it still retains its picturesque charm, making this area quite different in character to the rest of Stanmore. The very old buildings that are integral to the area include its grade II\* listed red brick Old Stanmore Church, Church Road which is a highly picturesque ruin dating to 1632 with numerous surrounding grade II\* listed monuments in the Churchyard, and the adjacent grade II\* listed stone Church of St. John the Evangelist, Uxbridge Road. It is due to the first of these Churches that the name 'Old Church Lane' developed. The northern parts of the Old Church Lane CA immediately adjoin the Stanmore Hill CA, and contribute to its setting’.

- 6.3.5 The local list entry for Orme Lodge, 4 Gordon Avenue reads: ‘Orme Lodge has architectural interest as highlighted by its local list description: ‘Substantial Edwardian residential building, a good example of the decorative, Arts and Crafts style and largely unaltered. Attractive red brick with decorative tile hanging, plain timber barge boards, bay windows, applied timber framing detail, and an oriel window. There is an oval window with good gauged brick surround. Retains timber windows. Corner siting provides prominence’. (Source of information: Old Church Lane Conservation Area Appraisal and Management Strategy adopted by Harrow Council 2006 and site assessment.)’
- 6.3.6 The Council’s Conservation Officer and Conservation Area Advisory Panel have both raised concerns regarding the impact of block A on the setting of the Old Church Lane Conservation Area due to its overall scale and siting. It is also noted some trees will be lost on the western boundary, thereby reducing the overall screening to the site entrance on Old Church Lane. Whilst Block A would introduce more built development closer to the conservation area of a greater scale compared to the existing development on this part of the site, officers do not consider this to be of a scale which would cause unacceptable harm to the setting of the conservation area. The vast majority of screening on the north western corner of the site and further beyond along Old Church Lane would remain. It is also noted that the two temporary buildings which are of poor quality and appearance, albeit of a lesser scale than proposed, would be removed which would create some improvement to the relationship with the conservation area. Moreover, it is considered that any perceived harm would be outweighed in this case by the significant public benefit of enhancement and improvement to educational facilities in the area.
- 6.3.7 The supporting townscape and visual assessment finds that the redevelopment of the site, which is already used as a college is entirely appropriate and reinforces the site as an educational centre. Officers concur with this view. Moreover, the visual assessment demonstrates that although some trees would be removed at the entrance along old Church Lane, it would not have a significant material affect on the nature of the verdant boundary to the west of the site which will remain as mature trees. Additionally. due to the drop in levels on the north western corner of the site block A would align with the adjacent retained college building.



View of Block A along old Church Lane

- 6.3.8 The Conservation officer has also raised concerns with the proposed material finishes outlining the grey finish shown would stand out more than is necessary and would not mitigate the impact or blend in. More appropriate natural materials should be considered such as timber cladding. The final selection of materials on the application site can be secured by planning condition in order to ensure the proposals will have an acceptable impact on the conservation area. It is further noted that the proposed railings at the front entrance would not blend in and should be amended to timber fencing to better blend in with the informal character of the conservation area. There are already some railings present at the entrance on Old Church Lane and as such, the provision of some railings is not considered to be entirely unacceptable. However, a planning condition can be secured to agree the final details of boundary treatment and extent of any railings, should approval be granted.

#### Protected Views

- 6.3.9 The site lies within the Protected Views Setting corridor, proposed country park at Wood Farm. However, given the height of the proposed development which is very similar to the existing and the amount of taller intervening built form and distance from the viewpoint, there is not considered to be any conflict with policy D3 of The Harrow DMP (2013).

## Archaeology

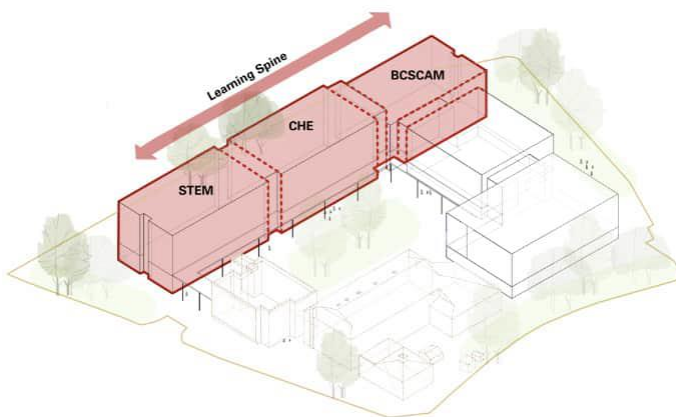
- 6.3.10 The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77063] Medieval Stanmore. The application has been referred to GLAAS who have advised that based on the submitted information, no further archaeological investigation is recommended.

## Siting, Layout, Scale and Massing

- 6.3.11 The Planning Statement outlines that the education needs of the college and DfE's requirements have been at the forefront of the design development process. The proposed development has been designed in accordance with the Government's design standards document Building Bulletin 103 and also with reference to with reference to Approved Document Part M (AD-M), the DfE's Building Bulletin 91 'Access for Disabled People to School Buildings', Building Bulletin 102 'Designing for disabled children and children with special educational needs' and BS8300:2018 'Design of an Accessible and Inclusive Built Environment.'
- 6.3.12 The applicant has also highlighted that it was imperative to the college to create space that could also be used by the community. As such, the community spaces (including sports hall, dining hall and lecture theatre) have been designed to be separate areas of the college that can be accessed by the community outside of the normal college operational hours.
- 6.3.13 The proposed buildings on site would be three to four storey high with blocks A and B in the north west of the site being four storeys where the site is a lower level. Blocks C, D and E would be three storeys. As a result of the existing topography, there would also be a change in floor level between central block D and the sports block (Block E).
- 6.3.14 A further driving factor for the proposed site layout, was the ability to provide adaptable and flexible teaching spaces to respond to changing educational curriculum. The four schools would be able to expand or contract horizontally into adjoining spaces, according to the demand for the curriculum.
- 6.3.15 The building would be split into five building blocks which represents the college's organisational structure of four schools and an area for shared resources. Each block would face onto a central courtyard. Three of the teaching blocks are located along the north of the site creating a teaching spine that contains the STEM, CHE and BSCSCAM schools. The fourth school, Sports, is located in the south east corner of the site of a new public space. The schools would be linked together in the middle of the site via the fifth block, the central hub which contains the college shared resources.
- 6.3.16 The spatial strategy for the site and rationalization of buildings around a central courtyard is considered to be logical and appropriate.
- 6.3.17 Existing buildings on site have height datums of 12.4m and 14.4m. Given that the proposed maximum height is 16m, this is not deemed to be a significant increase and the overall building heights are considered to be acceptable in the surrounding

context. Recessed glazed links join the five blocks together and assist in breaking down the overall massing by providing a visual contrast to the main blocks.

- 6.3.18 The internal arrangement of the ground floor plan is well considered in officers opinion. The arrangement of the dining hall, opening on to the central courtyard is considered to be successful as is the triple height ground floor foyer in creating a sufficient, light filled entrance space. The central block would be articulated differently to the other four blocks, creating a focal point to the campus.
- 6.3.19 The first floor teaching spine travels through blocks A, B and C. The proposed design provides a clear organisational structure by keeping the three northern schools separate by vertically stacking them through the building. Schools can expand or contract horizontally in order to respond to changing curriculum demand.



- 6.3.20 Daylight and sunlight is introduced to the centre of the spine via large voids and rooflights. The floor layouts would have generously wide, lit corridors. The circulation strategy has been designed to encourage students to move vertically through the buildings rather than horizontally in order to reduce disruption in each of the clusters where some open plan teaching may be taking place. In order to achieve this, staircases have been placed at the end of each block.
- 6.3.21 The overall layout and design of internal spaces is considered to be functional and well considered. However, the Council's urban design officer has raised some concerns with the design of the cafe, outlining the space currently appears sterile and could be made more vibrant given this is area is a key space to be used by



visitors and members of the public. This issue has been relayed to the applicant and further updates will be provided on the committee addendum.

### Design and Materials

- 6.3.22 The central hub would represent the new public face of the college and would be articulated differently to the other four blocks. The ground floor would be recessed, creating a covered area, outside the entrance and the café. Ground floor to ceiling glazing would provide views into and out of the college. The upper floors are proposed to be clad in aluminium cassette panels which would have a copper tone. Large vertical fins would project from the upper floor of the building which would create visual interest. Officers support the proposed material approach for the central hub building which would create a clearly distinguished building from the other teaching blocks and would provide a focal point for visitors.



Figure 3 Aerial View form the east





Figure 4: View from the new student and visitor entrance from Elm Park

- 6.3.23 The other four blocks would have a similar visual appearance. At ground floor a robust red brick is proposed. It is proposed to clad the upper floors in pigmented fibre cement panelling, with a lighter tone on the courtyard facing facades and a darker tone on the outward facing. The sports block would be clad in textured fibre cement panels that would be orientated in different directions to provide visual interest. Two slots of glazing on the east and south elevations would provide light into the space.
- 6.3.24 The western elevation of block A would have large vertical strips of glazing providing views into the teaching labs. Recessed coloured copper cladding would be used to enhance the elevation. The materials used on the west façade of block A would help highlight this side of the college being a key entrance to the site.



Figure 5: View of the new student entrance off Old Church Lane

6.3.25 The ground floor brick plinth to blocks A, B, C and E is considered to be acceptable. The dark fibre cement board to block E is also considered to be supportable, subject to securing further details of finish to ensure that fixings would be concealed and are not visible. However, there are strong concerns with the light-coloured fibre cement panel boards as they have a tendency to age poorly and stain around panel joins and fixings. At the time of writing this report, alternative material options have been requested from the applicant. Further information will be provided via the committee addendum.

6.3.26 The proposed application has been subject to a Design Review Panel. The panel were supportive of the overall massing, scale and general arrangement of the proposal. The Panel asked the design team to further consider the following elements of the scheme:

- Explore high quality boundary treatments.
- Creation of a more unique roof form and profiles to play a role in the buildings massing, as opposed to simple flat roofs
- Consider reducing the large amount of internal circulation space to reduce building footprints, generating more external space and more efficient buildings
- The location of the case adjacent to Elm Park was questioned and whether this could be better relocated to provide further activation to the central courtyard
- The panel noted that staircases could be better celebrated within the scheme and designed to create features.

- Concerns were raised with potential for overheating due to the large amount of south and west glazing
- The panel encouraged the design team to consider more natural material such as brick, stone or timber and provide a unique façade treatment for each of the blocks to better reflect their internal uses.

6.3.27 The design team have sought to respond to the design review comments. New boundary treatments have been provided within the red line boundary to parts of Old Church Lane and Elm Park including the addition of railings, hedges and planting to provide a welcoming frontage. Moreover, the internal circulation to blocks A, B and C has been rationalised, reducing the overall width of the blocks by approximately 0.5 metres, providing a slightly more generous external space. Brise soleil would be utilised due to reduce any overheating risk to the building as demonstrated in the submitted overheating analysis.

6.3.28 The applicant has not sought to amend the roof form outlining concern of increased heights on surrounding neighbours as a result of pitched roof forms. In officers view, although a more unique roof form could have enhanced the architectural appearance of the development, the proposed flat roof form is not considered to be unacceptable, and a sufficient degree of visual interest is achieved through the varying articulation of the different blocks.

6.3.29 The location of the café has not been altered as the applicant has noted that the relocation of this to the rear of the plan would sever the secure building line. However, officers consider the central courtyard would be sufficiently activated through the dining room and lecture theatre which would have direct connection to the courtyard and provides the opportunity to use the space together for events.

6.3.30 The applicant notes that the feature stair in the central hub has been designed to be a sculptural object. Although the staircase is not expressed as an external feature of the architecture, it does serve to provide an attractive feature within the building and provides a welcoming entrance into the rest of the building.





6.3.31 In conclusion, subject to securing appropriate materials, the design of the proposals with regard to siting, layout, scale, massing and materials will ensure a high quality design overall and respect the adjacent conservation area in accordance with the above outlined policies.

#### Landscaping

6.3.32 The application is accompanied by a landscape visual masterplan which shows the key elements of the Landscape Design which includes:

- Central Courtyard
- Entrances on Old Church Lane and Elm Park
- Cycle and Car Parking and utilities

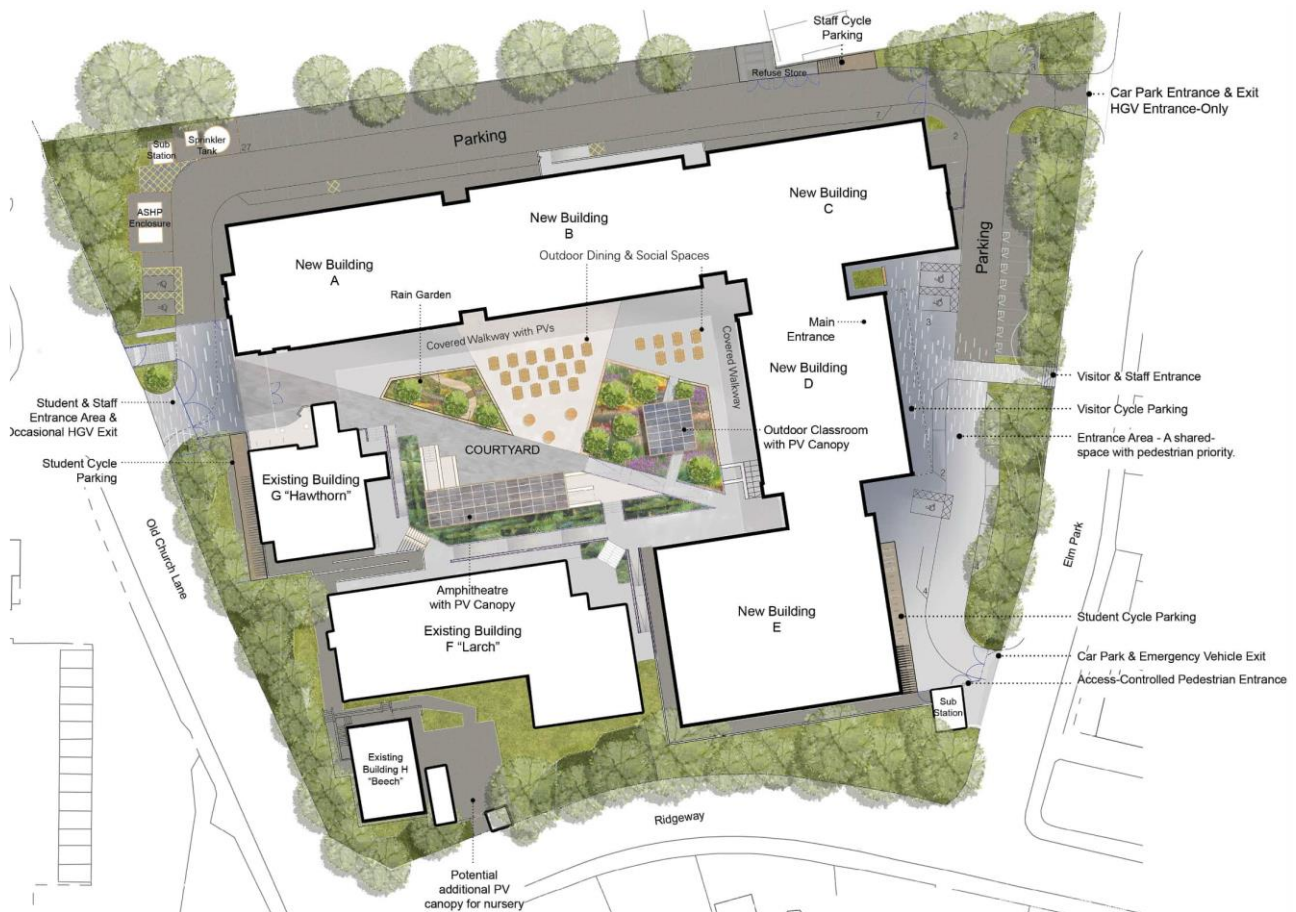


Figure 6 Landscape Masterplan

6.3.33 The central courtyard is particularly important to the creation of a campus where both existing and new buildings form a cohesive whole. The space allows for access to all buildings via both ramps and steps catering for the multiple access routes around and across the space.

6.3.34 The courtyard would be subdivided into four areas:

1. Amphitheatre
2. Outdoor Classroom
3. Dining
4. Rain Garden

6.3.35 The proposed spaces have been developed with the college to enable the delivery of their outdoor curriculum, edible planting for use in the kitchen, the study of nature and to maximise space for students to eat and socialise at all times of the year.

6.3.36 The planting design has been guided and influenced by a number of factors, most notably the college's needs, Biodiversity Net Gain (BNG) and London's "Urban Greening Factor". These have led to a rich biodiverse plant selection throughout with as many newly planted trees as possible.

- 6.3.37 The landscape proposals for the courtyard are generally considered to form a visually attractive and welcome space for future users and should work well and withstand the pressure and intensity of future use. However, it is noted that some concerns have been raised by the Council Landscape officer in relation to the amount of railings and fixed seating around the space and whether there is an option to remove some of these barriers to better interlink the space and create a more freeing and open space. Similar concerns have been raised by the Council's Urban Design officer who has outlined the central courtyard is heavily bisected by Landscape elements which fragments the external useable space of the college.
- 6.3.38 The applicant has advised that the extent of railings is minimised to avoid unnecessary cost. The requirements are to accord with Building Regulations for ramps, steps and protection from falls over retaining walls. Seating is integrated as a barrier to planting areas to prevent trampling of planting, access to the rain garden when it is holding water and control access to the outdoor learning area. It is proposed that seating being used as an integrated part of the edging to the planting areas, reduces clutter and maximises space for sitting/ socialising. In respect of the rain garden, the applicant notes that the provision of railings is a health and safety issue where the DfE mandate that rain gardens or similar SuDS features that hold water, are fenced and access is controlled for safety.
- 6.3.39 The council's urban design officer has also raised concerns with the PV panel canopies in the courtyard in terms of their unsightly visual appearance. The PV panels would make a positive contribution to the energy efficiency and sustainability of the site and a condition is recommended to ensure that the details of the final appearance of the PV panels are secured by condition. On balance, subject to a condition the PV panels are considered to be acceptable.

#### Boundary Treatments and Site Entrances

- 6.3.40 Access is provided to the site via three entrances. The main student entrance is located off Old Church Lane and is framed by a large portico. The visitor and alternative student entrance are to the east of the building on the ground floor of the central hub. The third is the community entrance located between the central hub and the sports block.
- 6.3.41 The boundary security proposed remains largely unchanged with new gates and fences introduced on Old Church Lane. Vehicle access is controlled, and the entrance areas are designed to give priority to pedestrians. New boundary treatments to parts of Old Church Lane and Elm Park include new railings, hedges and planting to provide a welcoming frontage. Student entrances are proposed to be framed with large, perforated metal porticoes that act as a wayfinding tool, identifying the entrances to users, providing an important moment of arrival and departure. The same perforation pattern has been used to identify key doors to the building.
- 6.3.42 The entrances and gates are welcoming and yet manage to control access into the site. A balance has been struck between giving the college prominence on the street as a community facility and respecting the residential use and well treed character of the roads. The views from Old Church Lane into the college site as proposed

have been opened up, by the loss of trees reducing the soft green screen and exposing a more prominent building, however on balance the development would fit in with the residential area.

#### Car Parking, Access, Cycles and Refuse

- 6.3.43 The car park is retained as existing and would be separated from the pedestrian zones and social spaces which is a positive improvement compared to the existing situation. A small planting zone is proposed along the car parks northern boundary to provide some additional green screening to the properties to the north, 15/16 Manor House.
- 6.3.44 Notwithstanding the above concerns raised, the Council's Landscape officer and Urban design officer are both supportive of the overall landscape strategy. The final landscape proposals for the central courtyard and elsewhere across the site can be secured through a planning condition, should approval be granted. Subject to this, the proposed landscaping is very positive and will make a significant contribution to the enhancement of the site and its biodiversity value.
- 6.3.45 The refuse and recycling store would be located within the main car park within a fenced enclosure in order to reduce the visual impact on the site. The refuse location would be the same as existing and is sited against the rear garden boundaries of 15 Manor House and 86 Elm Park.
- 6.3.46 Cycle parking areas have been located close to entrance points including adjacent to the existing Hawthorn building to the west of the site, the new sports block to the east of the site and within the car park. Further details of the enclosures could be secured by condition to ensure secure and visually acceptable storage areas are provided.

#### Trees

- 6.3.47 The existing trees are the most significant asset on the site and a large number of them are covered by Tree Preservation Orders. mature trees surround the site, contributing to the well treed character of the area and provide instant landscape, softening the existing buildings and the proposed development. It must be noted that there will be a loss of some trees on the site because of the proposed development.
- 6.3.48 An Arboricultural Survey by Arbetch identifies a total of 90 individual trees and 12 different groups of trees, which includes a variety of species such as Sycamore, Ash, Holly, Elm and Lime trees. The survey classified these trees in accordance with BS5837. An Arboricultural Impact Assessment, Arboricultural Method Statement, and a Tree Protection Plan, have also been submitted.
- 6.3.49 The Arboricultural Method Statement has outlined the individual trees and groups of trees within and adjacent to the Site. The method statement identifies a total of 26 individual trees (4 groups of trees) to be removed and 1 group of trees are to be partially removed to facilitate the proposed scheme. Of the individual trees to be removed, 5 are category U, 4 are category B and 17 are category C. All tree work

undertaken will be in accordance with BS 3998:2010 recommendations for tree work.

- 6.3.50 A Planting Schedule (dwg no. FE0011-NVB-XX-XX-L-L-2960) specifies a total of 34 new trees will be planted as part of the proposed development, which is an additional 8 trees from existing proposed to be removed.
- 6.3.51 Mitigation is required for trees removed from the site and it is noted that some of the trees removed from the periphery of the site are more substantial mature trees. There is little space on the site for replacement trees, particularly for replacement of larger at maturity native trees such as Lime, Ash, Oak. Officers consider that tree mitigation should take account of the loss of some mature trees as well as the smaller trees on the site and the replacement should be in a ratio of 2 new trees to 1 at the least.
- 6.3.52 The Council's landscape officer has advised that: *"the onsite replacement of trees should take account of the available space for tree growth and development over time to maturity. The new trees need to be suitable species and planted in the right place. There appears to be insufficient space for all the mitigation tree planting that would be required."*
- 6.3.53 Policy G7 of the London plan notes that *"Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy."*
- 6.3.54 The number of trees proposed to be replaced is not a significantly more than the trees lost. It is noted that the trees sizes proposed at time of planting are also small. They include 8-10cm, 10-12cm and 12- 14cm girth and smaller trees at 1.75m height, at time of planting and in the main include tree species that are appropriate for smaller spaces, such as in the courtyard, fruit trees and 20 pleached Hornbeam trees. The Hornbeams, although attractive and serve to provide a vertical green softening to the space, their form is controlled by pruning. Both the Council's landscape officer and Arboricultural officer have advised that these trees would not be appropriate replacements / mitigation for some of the trees which are to be removed from the site.
- 6.3.55 Consequently, officers consider that additional trees should be provided to mitigate the tree loss on the site as a result of the proposed scheme. The trees should be larger at time of planting. Species that are more significant and will become larger specimens at maturity can be planted offsite. As such, officers recommend this to be secured by a S106 agreement, which would enable additional street tree planting.
- 6.3.56 The Arboricultural Method Statement and Tree Protection Plan sets out the tree protection, demolition, construction, underground services, hard surfacing in the



RPA of trees and site management, monitoring and supervision. The works in relation to the retention of the existing trees can be secured by planning conditions.

## **6.4 Residential Amenity**

6.4.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan (2021) Policy D3, D13, D14
- Harrow Development Management Policies Local Plan (2013):DM1,

### Residential Amenity of neighbouring Occupiers

### Relationship with neighbouring properties and Daylight/sunlight Impacts

6.4.2 The existing Stanmore College has a public frontage to Elm Park, The Ridgeway and Old Church Lane. Two storey semi-detached dwellings fronting Elm Park are approximately 18.5 metres from the application eastern boundary. Two storey detached dwellings along the Ridgeway are separated by approximately 18 to 21 metres from the southern side boundary. Blocks C, D and E proposed as part of the redevelopment are three-storey and will be between 12.2-12.5m, similar to the heights of existing retained buildings. These buildings will not be located close to the site boundary. As such, they are not considered to give rise to any detrimental impacts in terms of loss of light, overshadowing or loss of outlook to the surrounding neighbouring properties to the east, south or west.

6.4.3 Beyond the northern boundary are two storey residential dwellings contained within the Manor House Estate and along Elm Park Road. No's 84/86 Elm Park are the closest residential dwellings to the site. However, these properties are not considered to be greatly affected by the proposed development massing, given the four storey elements are located away from these dwellings as well as the fact that Block C is 12.5 metres in height and replaces a building which is 14.5 metres in height. It is acknowledged that these properties would have a significantly different outlook from their rear gardens but is not considered to amount to a harmful visual relationship.

6.4.4 The majority of residential properties with the Manor House Estate are not located close to the boundary with the exception of No. 15/16. The properties have relatively short south facing gardens (approximately 11 metres in length) directly abutting the northern boundary. The overall separation between block B and C to the rear elevations of these properties would be 26 metres. It is also noted that the boundary is quite open in this section. As such, these properties would experience a significant change in outlook which will change from a more open outlook towards the existing landscaped space to a more enclosed and developed perspective. The overall separation between the main elevations of the houses and proposed blocks is nevertheless considered to be consistent with spacing and separation that is typical of many suburban areas across Harrow. The siting and size of the proposed blocks are not considered to be overly dominant or at odds with the wider character and relationships between buildings that might be found within this suburban location.

- 6.4.5 This application is supported by a Daylight and Sunlight Assessment, prepared by Stroma, which has assessed the impact of proposed development upon the immediately surrounding buildings. The assessment undertaken was in accordance with BRE good practice guidance document BR 209 Site Layout Planning for Daylight and Sunlight. Overall, the assessment has demonstrated that most of the surrounding buildings daylight levels are unaffected by the proposed development. It is noted, however, that five windows on the rear elevation of the Manor House Estate houses fall short of the recommended 27% BR 209 Vertical Sky Component (VSC). The report sets out that the proposed VSC of these five windows ranges from 25.72 – 26.81% and thus is just short of the recommended value of 27%. In terms of neighbouring garden spaces, all achieve sunlight BR 209 recommendations with the proposed buildings.
- 6.4.6 The LPA had a pre application discussion with the applicant prior to the submission of the application and the applicant was advised to set the upper storey of Block B back to reduce the impacts towards No. 15/16 Manor House. However, due to a number of factors, including the operation of the College, this was not taken forward. The applicant outlines this would have resulted in fundamental operational issues for the SEND unit and would have caused inherent issues with the future flexibility of the block. It would have resulted in the SEND unit stretched along an extended single sided corridor which the college did not consider feasible and also presented operational difficulties. The applicant has outlined that the spaces within the SEND unit need to be within a quiet, secluded area of the College, yet within an area that still has good connectivity and is close to ancillary spaces such as WCs. The applicant also notes that the proposed set back would have reduced the amount of PV panels as a result of self shading.
- 6.4.7 Taking account of the above operational issues with the college in relation to amended massing and the marginal transgression from the BRE guidelines with the proposed massing, officers consider the daylight/sunlight impacts to be acceptable in this instance when balanced against the significant wider public benefits of the proposal and that a refusal on this basis would not be justified.

#### Privacy and Overlooking

- 6.4.8 Given the relationship and separation distances from the properties to the east, west and south, the proposal would not result in any detrimental privacy relationships in respect of these properties. In respect of the properties to the north, No. 84/86 Elm Park, there would be an increased number of windows facing towards the rear garden of this property compared to the existing building. It is acknowledged that block C would have an oblique relationship with the rear elevations of these properties but nevertheless the large number of windows and close distance to the boundary (10 metres) would result in a perception of overlooking in officer opinion.
- 6.4.9 The impacts of overlooking would be much more acute for No. 15/16 Manor House as they would directly face Block B and have short rear gardens (11m). Given the amount of glazing on the northern elevations at high levels, this would result in actual and perceived overlooking.

6.4.10 It is acknowledged that whilst some out of hours use may take place, the most intensive use of the classrooms will be during college opening hours and not during the weekend, when residential gardens and properties are usually more likely to be occupied and sensitive to overlooking and privacy. Nevertheless, having regard to the relationships with No. 84/86 Elm Park and 15/16 Manor House, a condition for a scheme of obscure glazed window treatments is considered necessary. The submitted Design and Access Statement highlights that windows to the north have been altered to have a film at low level to obscure views out from the college but maintain daylight levels. As such, a condition is recommended in this regard to review the final details and treatment of windows.

#### Lighting

6.4.11 The applicant has provided a lighting assessment which demonstrates that the external lighting shall be designed and installed according to the School Output Specification Technical Annex 2E, ILP Guidance Note 01/21, BS 5489-1-2020, and BS 8300-2-2018. The luminaires shall use high efficiency LED lamps. The luminaires will be selected and positioned to minimise causing nuisance to neighbouring properties. The external lighting shall be controlled by a photocell and timeclock in series. The details of the lighting assessment have been reviewed by the Council's Environmental Health department who have raised no objection, subject to securing a condition to ensure that proposed lighting will adhere to the above standards.

#### Phasing

6.4.12 Six of the nine existing buildings on site have been identified as being in a poor state of repair and are no longer considered fit for purpose. The submitted phasing strategy outlined within the Construction and Environmental Management Plan identifies two main phases of development. Blocks A and B in the north western corner of the site would be completed in phase one and blocks C, D and E in phase two. The emerging phasing strategy proposes locating site offices against the northern site boundary adjoining rear gardens of Nos. 15 and 16 Manor House Estate. This is poor and would likely create disturbance and perceived overlooking. Final details of the proposed phasing and construction management of the site can be secured by planning conditions. It is inevitable that the construction period would cause some disruption to residents. However, conditions for construction logistics are recommended to ensure impacts are minimised as far as possible. As such, subject to the conditions mentioned the proposal is considered in officer opinion to be acceptable in this regard.

#### Noise

6.4.13 This application is accompanied by a Noise Impact Assessment, prepared by Aecom, which has assessed the proposed acoustic design approach for the building and the expected impact of noise upon nearby residents as a result of the development. The proposed design for the College complies with the Building Regulations Approved Document E (ADE) Requirement E4 and the noise impact has also been considered in line with the relevant guidance such as that included

within BS 4142:2014+A1:2019 Method for Rating and Assessing Industrial and Commercial Sound and other Local Authority Guidance.

- 6.4.14 The Noise Impact Assessment was undertaken in June 2023 and corroborates measures previously undertaken by 1st Horizon in October 2021 as outlined within their Noise Assessment. The Noise Impact Assessment concludes that given that the Site's use is not changing and the existing facilities include similar internal and external spaces, it is not anticipated to result in any significant changes when compared to the noise environment currently experiences as a result of the College activities.
- 6.4.15 The noise report has been referred to the Council's Environmental Health Department who have raised no objection to noise impacts subject to a condition to ensure the recommendation of the noise report have been achieved.
- 6.4.16 With regards to noise from plants, the noise report outlines that given that noise levels from the proposed plant items are not finalised at this stage in the design, a detailed plant assessment will be undertaken as the design develops to fully inform attenuation measures expected to be required to achieve the proposed limits. Therefore, a condition is recommended to ensure the detailed plant noise assessment is provided for approval.

### **Students Numbers**

- 6.4.17 The college is open 51 weeks a year, however the majority of courses run over 38 weeks. The current opening times are:
- 9am to 9pm Monday to Thursday
  - 9am to 5pm Friday
  - 9am to 4pm Saturday
- 6.4.18 The college have submitted a statement clarifying current and projected student numbers following completion of the development. Since 2014, the college has been predominantly for 16 to 18 year olds and has approximately 1550 16 to 18 year olds and 1, 181 19 + year olds (2731). The demographics of current learners at the college are 60% from Harrow, 25% from Brent and 15% from Barnet.
- 6.4.19 Following anticipated building completion in 2027/28, the overall student numbers could potentially rise with the addition of 290 full time learners and 510 part time learners. As such, the overall student enrolment level at the College could rise to 3,531 students. Staff numbers will also increase to approximately 230 (120 teaching and 110 nonteaching).
- 6.4.20 Notwithstanding the above, the College have confirmed that there will not be anymore students on site at anyone time compared to the existing situation as any additional student numbers will be staggered across the day and week. The college have recently introduced staggering across their courses in order to reduce the peak time influx of students coming onto site. Further details of student occupancy between 2021 and the present and anticipated student occupancy are detailed in the table below.

	2021/2022		2023/2024		2027/2028	
	Max No. students	9am Peak	Max No. students	9am Peak	Max No. Students	9am Peak
Mon	1341	900	1232	522	1400	900
Tue	2802	1800	1350	784	1400	900
Wed	1054	800	1350	860	1400	900
Thur	2802	1800	1400	753	1400	900
Fri	1207	1100	1200	570	1400	900

- 6.4.21 As can be seen from the table above, student numbers on site at anyone time and at the peak influx time of 9am have previously been significantly greater on specific days of the week compared to the existing situation. This demonstrates that staggered times have been successful in reducing overall peak numbers.
- 6.4.22 The college proposes to continue with staggered course times in relation to any potential increase of students. Start times would be staggered from 9am to 11am in the mornings and 12, 1 and 2pm on the afternoons. The college have confirmed that on completion of the development, there would be no more than 1400 students on site at anyone time which broadly aligns with the current maximum number of students on site and is much lower than previous numbers for 2021/22. Moreover, the college have also outlined that there would be no more than 900 students entering the site at the peak influx time of 9am. This is similar to the current peak influx time and much lower than previous years of 2021 to 2022 when on some days 1800 students would enter the site at 9am. The college have outlined that in a typical staggered scenario, the highest number of 900 students would arrive at 9am, the next highest number would be 500 arriving between 10 and 11am. At midday, 500 learners would leave and a further 500 learners would commence afternoon sessions. As such, at any given time, there will be no more than 1400 learners on site.
- 6.4.23 The College have outlined that they are able to manage the numbers of students across the days as a significant number of students undertake blended learning where they spend the majority of time in industry and may attend the college for a day or a few hours a week. In terms of the current enrolment activity at the college, 70% of learners undertake blended learning, approximately 130 adult learners spend one day on site, 10% of learners participate in online courses. The remaining students are ESOL (English for Speakers of other Languages) learners who spend three half days on site.
- 6.4.24 In terms of weekends, the college have outlined that of the 510 part time learners it is anticipated that 300 of them will be on site on Saturdays and as such the overall impact would be much lower. The overall attendance on Saturdays can be monitored and managed through the College Operational Management Plan.
- 6.4.25 The number of students entering the site are currently monitored electronically by swipe cards and this would continue to be the case with the proposed development.

Currently, students access the site by a small gate/turnstile on Old Church Lane which create queues along the pavement. The redevelopment would result in significant improvements to the access points on Old Church Lane and would allow a greater number of students to enter the site at once, creating a more efficient entrance and avoid students congregating on the street surrounding the college.

- 6.4.26 A number of representations have been received from neighbouring occupiers regarding noise and general disruption from students entering and leaving the college. Residents have also noted that the overall teaching space will be much larger than the existing space and therefore consider this would mean a greater number of students on site. It is acknowledged that the surrounding roads directly to the, north, south and east of the site have a quiet suburban character but also that the College on the site is along established educational institution in the area. Based on information provided by the college, the proposed development will not result in greater numbers of students on site at any one time than at present and much less than in previous years. In order, to ensure the proposal would not give rise to any detrimental impacts on the residential amenities of local residents, it is recommended that a College Operational Management Plan be secured through section 106 agreement which would cap the maximum number of students on site any time to 1400 and cap the peak influx of students at 9am to no more than 900. Further details of staggered start time across the day and week can be agreed as part of the Operational Management Plan to ensure any potential increases are managed so as not result in any harmful noise/disturbance and parking issues for the local residents surrounding the site as a result of the comings/goings of students. The management plan would also formalise details of monitoring and attendance records to be provided by the Council and further engagement with the local community to manage any issues that may arise. In addition, although there would be a significant increase in the amount of building space (3, 848sqm above the existing floorspace of 7197sqm), the college have advised this would not result in additional students as the additional space provide improved facilities such as large lab spaces and practical work spaces for courses in electrics/engineering and robotics.
- 6.4.27 A number of residents have also expressed concerns in relation to the relocation of the student entrance to Elm Park and potential noise and disturbance impacts which may arise. The applicant has outlined the entrance on Elm Park is for visitors and staff and the main entrance for students would be from Old Church Lane which is off a busier thoroughfare. Nevertheless, a small number of students would be able to utilise the entrance on Elm Park. Any issues that may arise from the use of this entrance can be monitored and managed through the college operational management plan.
- 6.4.28 It is considered that concerns relating to anti-social behaviour and vandalism outside of the college are matters for the police and are not material to the determination of this application. Nevertheless, it is considered that securing an operational management plan, including arrangements to engage the local community would assist in issues that may arise from students enter/leaving the site. The final details of the community element of the proposal (including hours of use and numbers of patrons) can be secured through a community use agreement to ensure there is an acceptable impact on surrounding neighbours in terms of noise and disturbance.

- 6.4.29 Residents have also raised some concerns with potential noise, disturbance and parking issues in relation to the community element of the proposal. The college currently operates some community activity on the site. The proposal will provide additional facilities including a sports centre with facilities for hire by local groups. Numbers of patrons, types of activities and operational hours of the site can be secured through a Community Use Agreement to ensure there would be no harm caused to local residents as result of additional community access.
- 6.4.30 In conclusion, subject to conditions and obligations, it is considered the proposals would be acceptable in relation to residential amenity and would comply with the above outlined policies.

## **6.5 Traffic and Parking**

6.5.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan 2021: T1, T2, T4, T5, T6, T6.5,
- Mayor's Transport Strategy: Policy 1
- Harrow Core Strategy CS1 R
- Harrow Development Management Policies Local Plan (2013):DM42 and DM 43, DM45

### Access

- 6.5.2 The application is accompanied by a Transport Assessment, prepared by Caneparo Associates. The site achieves a PTAL rating of 1b, which represents a 'poor' level of access to public transport. Notwithstanding this, there are still bus stops adjacent to the site, with Stanmore Underground Station located circa 1.2km to the north-east (15 minutes' walk), and therefore demonstrates that the site is still accessible by public transport.
- 6.5.3 The existing vehicle access to the north-east onto Elm Park will be retained and will continue to provide the main vehicle access into the site. The existing vehicle access to the south-east will be reconfigured to only allow egress only onto Elm Park, through the creation of a new one-way loop connecting the northern car park to the south-eastern corner. The shared vehicle and pedestrian access onto Old Church Lane will be restricted to pedestrian access only, however still allowing vehicle egress manoeuvres in the event of an emergency.

### Trip Generation

- 6.5.4 The TA finds that the number of vehicles accessing/egressing the site will remain the same as existing due to the total number of car parking spaces remaining the same. However, the report notes that there may be a slight increase in vehicle trips associated with the Site due to an anticipated increase in pupil and staff numbers. An assessment of the uplift in public and staff numbers has been undertaken. The assessment finds that the proposed development would result in an approximate 100 additional bus trips, which equates to five additional passengers every bus

service. The assessment has noted that the impact on all other modes of transport will have a negligible impact on the operation of the public transport network. In terms of car journeys, the proposals will result in an approximate 48 additional vehicles, which equates to one additional vehicle every 1-2 minutes.

- 6.5.5 Notwithstanding the level of increased vehicle trips, it is noted that the area surrounding the college is controlled by extensive CPZ between the Ridgeway and just north of September Way which operates Monday to Friday 10am to 2pm and north of this area Monday to Friday 3pm to 4pm. Officers consider this would preclude any significant levels of overspill parking in the vicinity of the site.
- 6.5.6 As part of the TA, a detailed parking survey was undertaken in order to understand existing levels of parking occupancy surrounding the site. A daytime parking survey was undertaken on Thursday 8th June 2023 between 08:00-17:00, to cover the existing operational hours of the site. This covered a 500m walking distance from the site and recorded parked vehicles on an hourly basis.
- 6.5.7 The parking survey shows that the average parking occupancy for the unrestricted parking areas is approximately 55%, with 167 available parking spaces on average for each hour. The busiest period is at 10:00 with 214 cars parked and 157 spaces available. Parking occupancy levels for the controlled parking areas were slightly lower than the unrestricted parking, however due to the restrictions, the TA notes that it is unlikely vehicles associated with the site park within these areas.
- 6.5.8 It acknowledged a number of residents have expressed concerns with the impacts of the development of levels of parking and traffic generated in the nearest streets.
- 6.5.9 The Council's Highways Authority have reviewed the information provided in the Transport Assessment in relation to potential parking impact. It is noted the report does not seem to include analysis of possible impact associated with student parking demand. As such, the Highways Authority have taken a snapshot of the roads that were surveyed to determine the activity that is currently taking place and looking towards the future when the site is occupied. The parking survey results indicate that zone B1 is operating successfully with plenty of capacity for parking throughout the day (students will not be able to park here between 10am and 2pm); zone B (close to the college) shows that there is an increase in demand around the start of the college day which then reduces when the zone becomes operational at 3pm – this suggests that the parking taking place there is likely to be associated with the College; the unrestricted streets close to the college have some capacity. Nevertheless, there are concerns that this development has the potential to generate a demand for additional on-street car parking – whilst this is unlikely to exceed the capacity of the total area surveyed, it is likely that it will impact a localised area close to the college that is unrestricted and the remaining parts of zone B.
- 6.5.10 On this basis, the Highways Authority consider that a contribution towards further analysis of the on-street parking would be required post occupation of the development in the sum of £10,000. Should surveys demonstrate that the extension of the existing CPZ(s) or changes to the operational hours of existing zones are required as a direct consequence of the development, a further contribution of



£30,000 would be required. A further contribution of £35,000 is required to mitigation in the form of Bus Stop Shelters along Old Church Lane. Bus stops are identified as the main mode of travel in the TA and shelters would encourage more use by existing and future students.

- 6.5.11 The transport assessment includes a healthy streets assessment and identifies improvements to cycle lanes including the provision of advisory cycle paint along Old Church Lane.

#### Car Parking

- 6.5.12 It should be noted that there are no prescriptive London Plan standards for the provision of car parking spaces for educational uses and the level of parking should therefore be considered on a case-by-case basis. A total of 82 car parking will be provided, the same as existing, with five provided as disabled parking, and 14 with active electric vehicle charging points. The parking spaces will be able to be utilised by staff only who will need to request a fob from the college in order to gain access into the parking area via the controlled access area on Elm Park. The level of parking is required in order for the site to operate effectively, however staffing levels are increasing and therefore the provision will assist in promoting sustainable modes of travel.

#### Cycle Parking and Sustainable Travel

- 6.5.13 The application is supported by a Travel Plan. The Travel Plan sets out several measures which include promotional information for students and staff about safe walking routes, a Travel Notice board and a school newsletter with timetable information about public transport and the provision of secure cycle storage and training. The Council's Travel Plan Officer has reviewed the information and overall supports the modal shift targets for staff and pupils. The college would be required to work towards gold STARS accreditation. The applicant has confirmed that they would commit to Bronze level accreditation in year 1, silver by year 3 and gold by year 5. The applicant has also confirmed that all cycle parking will be funded and provided by the developer. The details of this can be monitored and secured through section 106 agreement. Subject to this, the proposal would make a significant contribution towards sustainable travel for the college and mitigate impacts on the surrounding local roads in relation to overspill parking.
- 6.5.14 In order to encourage modal shift to more sustainable modes of transport, it is recommended that the Travel Plan and above financial contributions for highways improvement works be secured and monitored through a section 106 agreement.
- 6.5.15 In addition, cycle parking has been provided across the site for both staff, pupils/students and visitors. The provision has been based on the average number of pupils/students anticipated to be on-site at any-one time,

6.5.16 A total of 200 cycle parking spaces are proposed to be delivered, which is broken down into:

- Long stay for pupils / students: 158
- Long stay for staff: 24
- Short stay for visitors: 18

6.5.17 When compared to the existing levels of cycle parking at Stanmore College, this is an uplift of 176 cycle parking spaces. The layout of the cycle parking will adhere to the London Cycle Design Standards (LCDS) as all long-stay cycle parking will be provided in sheltered and secured storage, 5% of the spaces will be designed to accommodate accessible cycle spaces and the majority will be provided in two-tier racks, however a proportion will also be provided as Sheffield hoops that are easily accessible.

6.5.18 The level of cycle parking proposed is supported by the Highways Authority and would accord with the above policy requirements. Detailed cycle parking proposals can be secured by conditions.

#### Refuse and Servicing

6.5.19 All servicing and refuse collection will take place on-site, with access and egress taken from Elm Park via the main vehicle access.

6.5.20 Subject to conditions and obligations outlined, it is considered that the proposal would satisfy the above policy requirements.

## **6.6 Biodiversity**

6.6.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan 2021 SI13, G5, G6, G7
- Harrow Core Strategy CS1 E
- Harrow Development Management Policies Local Plan (2013): DM1, DM12, DM20, DM 21
- Circular 06/05: biodiversity and geological conservation)

#### Biodiversity

6.6.2 This application is accompanied by a Preliminary Ecological Appraisal and Preliminary Bat Roosting Assessment, prepared by Arbetech, which identifies the baseline ecological conditions and the likely significance of ecological impacts on the proposed development, as well as to determine the presence or likelihood of roosting bats.

6.6.3 The Appraisal identifies that no impacts to designated sites are anticipated due to the small scale and distance of the proposed development, nor will it have any direct impacts on notable habitats. However, due to the proximity of the site to deciduous woodland and hedgerows, indirect effects such as pollution or tree damage could

occur during construction. It is also considered that the proposed development will not result in the removal of any habits which could be used by foraging or community bats. The proposed development does result in the demolition of existing buildings and the Appraisal identified two buildings as having moderate suitability (Buildings B3a and B4) to supporting roosting bats and one building as having low suitability (B1). All other buildings had negligible suitability to support roosting bats.

- 6.6.4 The Appraisal identifies that no impacts to designated sites are anticipated due to the small scale and distance of the proposed development, nor will it have any direct impacts on notable habitats. However, due to the proximity of the site to deciduous woodland and hedgerows, indirect effects such as pollution or tree damage could occur during construction. It is also considered that the proposed development will not result in the removal of any habits which could be used by foraging or community bats. The proposed development does result in the demolition of existing buildings and the Appraisal identified two buildings as having moderate suitability (Buildings B3a and B4) to supporting roosting bats and one building as having low suitability (B1). All other buildings had negligible suitability to support roosting bats.
- 6.6.5 Furthermore, the application is supported by a Biodiversity Net Gain Assessment, prepared by Arbtech. Arbtech have noted the landscaping proposals generate a net gain of area-based habitat units (+21.7%). Recommendations for the implementation, management and monitoring of the site for at least 30 years, are outlined in the Ecological Management Plan (Arbtech Consulting Ltd 2023).
- 6.6.6 Moreover, NVB Landscape have calculated that the landscape proposals will achieve an UGF score of 0.42, which would be a significant increase from London Plan and DfE requirements.
- 6.6.7 The application has been referred to the Council's Biodiversity Officer who has raised some queries over the potential contribution to Biodiversity Net Gain due to disagreement with the baseline habitat value. However, the applicants have made a commitment to deliver 20% biodiversity net gain which would exceed the minimum statutory provision of 10%. Officers recommend that a section 106 obligation is secured to ensure that the 20% biodiversity net gain and ongoing management for at least 30 years is achieved. Moreover, the obligation for biodiversity net gain would include the provision of some off site larger tree specimens to provide acceptable mitigation against some of the high quality trees that would be lost as a result of the proposal.
- 6.6.8 Subject to the above obligation, it is considered that the proposal would make a positive contribution to biodiversity and would be acceptable in relation to the above policies.

## **6.7 Air Quality and Contaminated Land**

6.6.9 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan 2021: SI1

- Harrow Development Management Policies Local Plan (2013): DM1, DM12, DM15

### Air Quality

- 6.6.10 As outlined in the London Plan (2021) (Policy SI 1), all development proposals should minimise increased exposure to existing poor air quality and take steps to minimise the impacts through design solutions and promote greater use of sustainable transport modes through travel plans. As a minimum, development proposal should be air quality neutral.
- 6.6.11 The whole of the Borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>).
- 6.6.12 An Air Quality Assessment has been undertaken as part of the proposals. The proposals will not include any increase in vehicle movements and are located away from the local road network. As such, the report finds that alongside the implementation of appropriate controlled measures, the air quality impacts associated with the proposed development are not deemed significant and therefore demonstrate compliance with the relevant planning policy. Mitigation measures are set out for the construction phase including management of dust and the use of low emissions vehicle machinery. The incorporation of mitigation measures can be secured through planning conditions. Subject to this, the proposals are considered to be acceptable in relation to air quality impacts. The Council's environmental health department have raised no objection to the development on air quality grounds.

### Contaminated Land

- 6.6.13 A Contaminated Land assessment has been undertaken as part of the proposals. The report finds that some soil samples contained slightly elevated levels of arsenic and lead contamination, but it was concluded that long term remedial measures were not required but recommends the appropriate use of PPE during construction. Other contaminants including groundwater and gas were also assessed and it was find remedial measures would not be required. Comments have been sought from the Council Environmental Health team and this will be reported via the committee addendum.
- 6.6.14 A Phase 2 Ground Investigation Report was prepared by 1st Horizon in March 2022 which investigated the ground conditions of Stanmore College and presented its geotechnical recommendations for future development. In addition to the above report, a further Site Investigation and Geotechnical Assessment was undertaken by Milvum Engineering Services, which used the Phase 2 Ground Investigation Report as baseline data for their assessment. The report has provided geotechnical information, identifying the underlying ground and groundwater conditions to assist in the design of the proposals. The investigation identified no visual or olfactory evidence of contamination and as such, it is considered that the proposed redevelopment accords with planning policy. No concerns have been raised from the Council's Environmental Health Department.

## **6.7 Drainage and Flood Risk**

6.7.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan 2021: SI 12 and SI13
- Harrow Core Strategy 2012: CS1T
- Harrow Development Management Policies Local Plan (2013):DM9, DM 10

6.7.2 The majority of the site lies within flood zone 1 and is therefore at low risk of flooding. There are some small areas of surface water flood zone across the site.

6.7.3 The application is accompanied by a Flood Risk Assessment which finds that flood risk from groundwater, surface water and overland flow are low.

6.7.4 The proposed drainage strategy includes a SUDs scheme that will reduce overall run off rates from the site. Surface water attenuation is proposed and will be provided in a number of ways including through attenuation tanks and the rain garden within the central courtyard.

6.7.5 The application has been referred to the Council's drainage engineers who have advised that the submitted drainage strategy is acceptable and would comply with the above policies, subject to a planning condition to secure details of permeable paving on the site and its maintenance.

## **6.8 Energy and Sustainability**

6.8.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan 2021: SI2, SI13, SI4, SI7, SI8
- Harrow Core Strategy 2012: CS1U
- Harrow Development Management Policies Local Plan (2013):DM12, DM13, DM14

6.8.2 The application is accompanied by an energy strategy. Through implementation of the three step energy hierarchy outlined in the London Plan ( Be Lean, Be Clean, Be Green), the cumulative CO2 savings on the site are estimated to be 154% over Part L regulation baseline.

6.8.3 Energy efficiency will be achieved through a range of measures including a high performing façade with high levels of insulation, low air permeability, daylighting, sensor control and efficient ventilations systems.

6.8.4 The LZC Feasibility Study undertaken as part of the Energy Statement has established the most appropriate local (on-site or near-site) Low or Zero Carbon (LZC) energy source for the proposed development. The use of GSHP, ASHP and PV were identified as the recommended technologies. The results demonstrate a 136.8% reduction in regulated CO2 emissions on the Building Emissions Rate

(BER) from Part L2 2021, when compared to the development without LZC technologies.

- 6.8.5 Policy SI2 requires that at least 15% reduction should be achieved through energy efficiency measures. It is noted that the development would not meet this requirement. However, the applicant has submitted a supporting statement to seek to justify the non-compliance with the 15% requirement. The energy efficiency measures within the statement appear reasonable. It is noted that the 15% requirement in the London Plan was under the former 2013 version of Part L of the Building Regulations, and it is understood that it is more difficult to achieve the 15% requirement under the more recent 2021 Part L. This is reflected in work jointly commissioned by the Council with respect to Delivery Net Zero, which found that for schools, only one scenario modelled achieved the 15% reduction. Given this and the supporting statement submitted by the applicant, the non-compliance with the 15% requirement in the London Plan is considered acceptable in this instance.
- 6.8.6 The proposed development will be net zero carbon and therefore no monetary contribution is required to offset carbon emissions. When unregulated emissions (i.e. those not covered by the Building Regulations i.e. computers etc) are taken into account, the overall carbon reductions are circa 70%, which is positive.
- 6.8.7 It is noted that the site is not located within proximity to an existing heat network and therefore a connection is not possible. However, a planning obligation should be required to ensure a safeguarded route is provided to enable future connection to a district heat network should one become available nearby.
- 6.8.8 The submitted sustainability report outlines a range of other sustainability measures to be incorporated into the development and addresses water efficiency, materials and waste and sustainable transport measures including a significant increase and improvement in cycle parking facilities at the site.
- 6.8.9 In addition, an Overheating Report prepared by Method Consulting, has been submitted in support of the application to identify the overheating analysis of the proposed development and ensure that the proposed development has been designed to meet the temperature and CO2 requirements as set out in the Department for Education (DfE) Further Education Output Specification (FE-OS) and the London Plan overheating criteria. The Overheating Report demonstrates that all learning and teaching spaces comply with the requirements of CIBSE Technical Memorandum 52 (TM52) for the current London Heathrow Design Summer Year (DSY1) 2080 weather file in accordance with policy SI4 of the London Plan (2021).
- 6.8.10 The application documents have been reviewed by the Council's policy department who have raised no objection to the submitted documents. Overall, it is considered that the proposals satisfy the above policy requirement. A condition is recommended to secure the implementation of the sustainability and energy strategy.

## 6.9 Accessibility and Fire Safety

6.9.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: D3, D5, D11
- Harrow Development Management Policies Local Plan (2013):DM1, DM 2

6.9.2 The new building has been designed to be fully accessible and inclusive. The design proposals have been developed with reference to Approved Document Part M (AD-M), the DfES Building Bulletin 91 'Access for Disabled People to School Buildings', Building Bulletin 102 'Designing for disabled children and children with special educational needs' and BS8300:2018 'Design of an Accessible and Inclusive Built Environment

6.9.3 The design will cater for the visually impaired, those with poor manual dexterity and physical disabilities. All external spaces to the new building will be accessible with level thresholds at ground floor. There are two lifts in the building, one serving the four storey element and another the three storey.

6.9.4 The car park includes accessible parking spaces located close to the main entrance, properly lit and with appropriate markings. The routes into the buildings are clear and will be signed and demarcated appropriately using landscape treatments and architectural elements. There are no abrupt changes in level on the approach to the new proposed building. The staircases would be wide and designed to ambulant standards with handrails of appropriate type and position, closed risers and contrasting nosings. Officers consider that the applicant has satisfactorily demonstrated that the building will be fully inclusive and accessible to all.

6.9.5 The application is accompanied by a fire strategy which has been verified in consultation with a qualified fire engineer. The fire engineer has confirmed that the principles of fire tender access and escape from the building would meet the relevant building regulations Part B guidance. The fire strategy has been referred to the Council's Building control department who have noted that the proposal would not meet the requirements of policy D5 which requires a lift to be provided in every stair core. The building would have two passenger lifts, one between blocks A and B which serves the four storey element of the building and the second between the central hub and Block E. All protected stairs will however be provided with disabled egress facilities, such as an evacuation chair, in line with BS 9999. The DFE have advised that the provision of a lift to every stair core would have significant implications for the feasibility of the project and the proposal would still accord with Part M of the Building regulations. Having regard to the significant educational benefits that the proposal would deliver when balanced against the conflict with policy D5B, in officers opinion, this is outweighed in this instance by other material policy considerations. Overall, the building would still achieve a high level of inclusive access which would be consistent with Building Regulation requirements.

## **7.0 CONCLUSION AND REASONS FOR APPROVAL**

- 7.1 The proposed education needs of the school and benefits of the proposal have been robustly demonstrated in the Education Needs Assessment and carries substantial weight.
- 7.2 The proposed height and scale of the blocks are considered to be appropriate and would respect the retained buildings on the college site and buildings heights in the wider area. The proposals are considered to be sufficiently separated from the adjacent Old Church Lane Conservation Area and the scale and massing of the proposal are not considered to result in any unreasonable harm. However, as noted elsewhere, there is a concern with the appearance of the development in the long term as a result of the light-coloured fibre cement board panels which could detract from the Conservation Area and surrounding locality. Subject to a condition, to ensure the selection of final appropriate material finishes, this aspect of the proposal would result in acceptable impact on the Conservation Area and locality. Overall and subject to agreement of final material details, the less than substantial harm identified in relation to heritage assets is considered to be outweighed by the education need and community benefits of the proposal.
- 7.3 A number of residents have expressed concerns in relation to noise, disturbance and parking in respect of potential student increases. However, subject to a section 106 agreement to secure a College Operational Management Plan which would cap the maximum number of students on site at any time and agree details of staggered start times, it is considered the impacts of the proposal will not result in any significant levels of harm compared to the existing situation. With regard to neighbouring amenity impacts, it is acknowledged that there are some identified minor deviations from the BRE guidance in respect of daylight to two neighbouring properties to the north of the site as a result of the proposal. However, when weighed against the educational benefits, this issue is not considered to be sufficiently harmful to warrant a refusal of the application.
- 7.4 The development would secure a £40,000 contribution to review and potentially extend the CPZ area surrounding the site if required. A further £35,000 would be secured to provide bus stop shelters on Old Church Lane and encourage and enhance sustainable travel to and from the site. Subject to this, there would be no unreasonable detrimental highways impacts arising from the development.
- 7.5 The development would result in landscape and ecological enhancements. Subject to a planning obligation, the proposal would achieve 20% biodiversity net gain which attracts significant positive weight. In addition, the proposal would contribute towards the strategic objectives of reducing carbon reductions in the borough.
- 7.6 Overall, whilst there are currently some shortcomings of the proposal identified in the above appraisal, having regard to the significant weight that must be applied to create and expand education outlined under paragraph 99(a) of the NPPF (2023), on balance, the proposal is considered to be acceptable, and any harm can be satisfactorily mitigated through planning conditions and obligations.



## **APPENDIX 1: Conditions and Informatives**

### 1. Timing

The development hereby approved shall be begun before the expiration of three years from the date of this planning permission.

REASON: To comply with the provisions of section 91 of the Town and Country Planning Act 1990.

### 2. Approved Plans and Documents

Save where varied by other planning conditions comprising this permission and unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved drawings and documents.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policy D3 of the London Plan (2021) and Policies and policy DM 1 of the Local Plan (2013) and for the avoidance of doubt and in the interest of proper planning.

## **PRE-COMMECEMENT (INCLUDING DEMOLITION)**

### 3. Demolition, Construction Logistics, Management and Phasing Plan

Notwithstanding the approved plans and documents, no development shall take place, including any works of demolition, until a demolition and construction logistics and phasing plan has first been submitted to, and agreed in writing by, the local planning authority.

The plan shall detail the arrangements for:

- a) Development phasing
- b) detailed timeline and details of management for the phases and implementation of the development
- c) The parking of vehicles of site operatives and visitors;
- d) Loading and unloading of plant and materials;
- e) Storage of plant and materials used in construction of the development;
- f) The erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- g) Wheel washing facilities;
- h) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- i) Measures for the control and reduction of dust and
- j) Measures for the control and reduction of noise and vibration; and

The demolition and construction of the development shall be carried out in accordance with the plan so agreed.

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighboring occupiers, in accordance with Local Plan Policies DM1 and DM43 and Policy D3 of the London Plan (2021) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy T4 of the London Plan (2021), this condition is a PRE-COMMENCEMENT condition.

4. Construction and Site Waste Management Plan

No development shall take place, including any works of demolition, until a construction and site waste management plan, setting out arrangements for the handling of excavation, demolition and construction waste arising from the development, and to make provision for the recovery and re-use of salvaged materials wherever possible, has been submitted to and approved in writing by the local planning authority.

The development shall be carried out in accordance with the approved plan or any amendment or variation to it as may be agreed in writing by the local planning authority.

REASON: To ensure that waste management on the site is addressed from construction stage and to promote waste as a resource, in accordance with Policy SI 8 of the London Plan (2021), Policy CS1 X of the Core Strategy (2012). To ensure that measures are agreed and in place to manage and re-use waste arising during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

5. Non-Road Mobile Machinery

The development shall not be commenced, including any works of demolition, until details have been submitted and approved in writing by the local planning authority for all Non-Road Mobile Machinery (NRMM) to be used on the development site. All NRMM should meet as minimum the Stage IIIB emission criteria of Directive 97/68/EC and its subsequent amendments unless it can be demonstrated that Stage IIIB equipment is not available. An inventory of all NRMM must be registered on the NRMM register <https://nrmm.london/user-nrmm/register>. All NRMM should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment.

REASON: To ensure that the development would not result in a deterioration of air quality in accordance with Policy SI 1 of the London Plan (2021) to ensure that suitable vehicles would be used during the construction process, this is a PRE-COMMENCEMENT CONDITION.

## **NO COMMENCEMENT – APART FROM DEMOLITION**

### 6. Permeable Paving

No development shall take place, other than works of demolition, until details of permeable paving, have been submitted to, and agreed in writing by, the local planning authority. The submitted details shall include measures to prevent water pollution and details of their management and maintenance.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that sustainable urban drainage measures are exploited, in accordance with London Policies SI 12 and SI 13 of the London Plan (2021) and Policies DM 10 of the Local Plan (2013). To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition.

### 7. Levels

Notwithstanding the details shown on the drawings, no site works or development shall commence (other than demolition works) until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement in accordance with Policies DM 1, DM 10 and DM 42 of the Harrow Development Management Policies Local Plan (2013). To ensure that appropriate site levels are agreed before the superstructure commences on site, this condition is a PRE-COMMENCEMENT condition.

## **NO DEVELOPMENT ABOVE DAMP-PROOF COURSE LEVEL**

### 8. External Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress beyond damp proof course level for any building in each phase of the development until samples of the materials to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) Facing materials for the building which shall include details of any required fixings;
- b) Windows/doors for the building.
- c) Ground surfacing

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance and safeguards the character and appearance of the designated heritage assets on the application site in accordance with Policy D3 of the London Plan (2021) and Policies DM 1 and DM 7 of the Local Plan (2013).

9. Hard and Soft Landscaping

The development hereby approved shall not progress beyond damp proof course level of any building hereby permitted, until a scheme for the hard and soft landscaping details and has been submitted to, and agreed in writing by, the local planning authority. The hard and soft landscape details shall include the following:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials and hard landscape elements including planters, furniture, external seating, railings, canopies, green walls, landscape structures, tree pits, drainage, irrigation or watering system, growing medium, details for tree planting pits and staking/support; specification for supports and fixings for plants; details of retaining and gabion walls, steps, ramps for all areas, with construction detail and levels along the wall lengths at top and toe of retaining walls and for all level changes.

Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme with proposed timing / dates for the works.

The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer.

- b) Full scale metric cross sections and elevations for all communal amenity spaces (at a scale of not less than 1:100) including the proposed details for the level changes, including steps, ramps, retaining walls and canopies.
- c) Details of all boundary treatment and gates

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive

public realm and to ensure a high standard of design, layout and amenity in accordance with Local Plan Policies CS.1B, DM1, DM7 and Policies D3, G5, G6 and G7 of The London Plan (2021) and to ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity in accordance with Local Plan Policy DM 21.

10. Bio/Solar Green Roof

Notwithstanding the approved plans and documents, prior to the construction of any work above damp proof course level for any building in each phase of the development hereby approved, a scheme for the bio/solar green roof shall be submitted and approved in writing by the local planning authority. The submitted scheme shall include details of the following:

- a. its location, extent, specification (plant species and soil depth), landscape integration, integration with other roof plant or renewable energy infrastructure, structural integrity, construction, operation and access.
- b. Section/profile drawings showing the growing medium and depth, different layers and membranes, waterproofing layer and protection, insulation.
- c. Planting scheme (time of planting, plant species, watering etc). Plant selection to comprise of native species appropriate to and applicable for aspect and use to encourage biodiversity. The layout to incorporate biosolar roof with PV panels and planting combined.
- d. Written specification of planting, schedules of plants, noting species, plant sizes, types of vegetation (all at time of planting) proposed numbers / densities.
- e. Plans to show clearly its location, extent, drainage catchment areas (if relevant), inlets and outflows.
- f. Access for maintenance.
- g. Details of Irrigation or watering.
- h. Maintenance plan to show how it will be maintained regularly, including how the bio-solar, photovoltaic panels and green roofs interact to ensure the extra heat is managed in the maintenance plan, maintenance considerations due to other roof infrastructure and any changes in maintenance throughout the seasons.

The development shall not be completed otherwise than in accordance with the green/ blue roof details so approved and shall thereafter be so maintained.

REASON: To reduce flood risk and to contribute to sustainability and enhance the biodiversity of the local area in accordance with policies, SI 13, G5 and G6 of The London Plan (2021) and policies DM 10, DM 20 and DM 21 of the Harrow Development Management Policies Local Plan (2013).

11. Windows Treatment to Northern Elevations

The development hereby approved shall not progress beyond damp proof course level of any building in each phase of the development until details for the treatment of windows on the first and second floors to the northern elevation of building blocks B and C to prevent overlooking and loss of privacy to neighbouring

occupiers, has been submitted and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details and thereafter retained.

REASON: To safeguard the residential amenities of the neighbouring occupiers to the north in accordance with policy D3 of The London Plan and policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

### **PRIOR TO COMPLETION OF THE SUPERSTRUCTURE**

#### 12. Solar Panels

Prior to completion of the superstructure of any building hereby approved in each phase of the development, details of the solar panels and their fixings on the main roof of each building and on the canopies within the central courtyard shall be submitted and approved in writing by the local planning authority. The solar panels shall be installed in accordance with the approved details and thereafter retained.

REASON: To ensure that the development contributes to the creation of a high quality, and attractive public realm and to ensure a high standard of design in accordance with Local Plan Policies CS.1B, DM1 and Policy D3 of The London Plan (2021).

### **PRIOR TO OCCUPATION**

#### 13. Secured by Design

Prior to the first occupation of each phase of the development, evidence of Secured by Design Certification shall be submitted and approved in writing by the Local Planning Authority. The development shall be retained in accordance with the approved details.

REASON : In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime, in accordance with Policy D11 of the London Plan (2021) and Policy DM2 of the Local Plan (2013), and Section 17 of the Crime & Disorder Act 1998.

#### 14. Soft Landscaping Management and Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the hard and soft landscaping relating to the development has been submitted and approved in writing by the Local Planning Authority. The details shall include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years, including the ground level hard and soft landscape, and landscape structures for plant growth and a programme of maintenance including a calendar of routine physical tasks for all landscape areas / plant replacement for the life time of the development for landscape structures.

The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity, in accordance with Policies DM21 and DM22, of the Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Local Plan.

15. Cycle Parking

The development hereby permitted shall not be occupied until details of the cycle parking spaces on the site and their phased delivery have been submitted to and approved in writing by The Local Planning Authority. The cycle parking shall be implemented on site in accordance with the approved details and shall be retained for the lifetime of the development.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy T5 of The London Plan 2021 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

16. Noise

The development hereby approved shall be undertaken in accordance with the recommendations of the Noise report hereby approved (FE0011-AEC-XX-XX-T-J-0002- Noise Impact Assessment-S5-CO1). Prior to first occupation of each phase of the development, details shall be provided to the local Planning Authority for approval in writing, demonstrating compliance with the Noise Report. The development shall thereafter be retained in accordance with the approved details.

REASON: To safeguard the residential amenities of the surrounding neighboring occupiers in accordance with policy D3 of the London Plan (2021) and policy DM 1 of the Harrow Development Management Policies Local Plan.

17. Car Park Management Plan

Prior to the first occupation of the development hereby approved, a Car Parking Design and Management Plan shall be submitted to, and agreed in writing by, the Local Planning Authority. The plan shall set out the following:

- a) Details of the parking design with reference to Transport for London Guidance on parking management and design
- b) Details of general spaces that are to be 'active' electric vehicle charging point spaces and are to be 'passive' electric vehicle charging point spaces.

- The plan should outline the provision of one active Electric Vehicle Charging Point for at least 10% of spaces from the outset.
- c) Details of Disabled persons parking spaces in accordance with the levels set out in Table 10.6 of the London Plan 2021.
  - d) Mechanism for increasing the number of general spaces that have an 'active' electric vehicle charging point if monitoring demonstrates additional demand.
  - e) Details of the allocation and management of the general and accessible car parking spaces.
  - f) Details of how the car parking spaces could be removed in the future should they become surplus to requirements and potentially be re-provided as cycle storage.
  - g) Details of details of monitoring, management and enforcement procedures for parking within the site

The development shall be carried out and operated only in accordance with the plan so agreed.

REASON: To ensure that the car parking is managed in a satisfactory manner and that the development contributes to more sustainable travel in accordance with Local Plan DM42 and Policy T6 and Policy T6.5 of the London Plan (2021). To ensure that appropriate car park design before development commences on site, this condition is a PRE-COMMENCEMENT condition.

## **POST OCCUPATION**

### 18. Energy and Sustainability

The development shall be undertaken in accordance with the approved Sustainability Statement and Energy Strategy. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Strategy which thereafter shall be submitted to the Local Planning Authority for written approval.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2023, policies SI 12 and SI 13 of The London Plan (2021).

### 19. Noise – Mechanical Plant

The rating level of noise emitted from any plant, machinery and equipment on the site, including within the approved electrical substation, shall be lower than the existing background level by at least 10 dB(A). Noise levels shall be determined at one metre from the boundary of the nearest noise sensitive premises. The measurements and assessments shall be made in accordance with BS 4142:2014. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.



Before any plant is used, measurements of the noise from the plant must be taken and a report / impact assessment demonstrating that the plant (as installed) meets the design requirements stated above, shall be submitted to be approved in writing by the Local Planning Authority.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Local Plan Policy DM1 and Policy D14 of the London Plan (2021).

## **COMPLIANCE**

### 20. Implementation of hard and soft Landscaping

All hard landscaping shall be carried out in accordance with a programme first agreed in writing by the local planning authority. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the new building being brought in to use or the completion of the development, whichever is the sooner.

Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity, in accordance with Policies DM22 and DM 21 of the Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Local Plan.

### 21. Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other

offsite receptors in accordance with Policy 5.21 of the London Plan 2016 and Policy DM 15 of the Harrow Development.

22. Protection for Breeding Birds

If the development hereby permitted commences during the bird breeding season (March to August inclusive) trees and buildings in the vicinity of the site shall be examined for nests or signs of breeding birds. Should an active bird's nest be located, time must be allowed for birds to fledge and the nest should not be disturbed during building works.

REASON: To safeguard the ecology and biodiversity of the area in accordance with policies DM 21 and DM 22 of the Harrow Development Management Policies Local Plan (2013).

23. Architecture Retention

The applicant shall use reasonable endeavours to ensure that the scheme Architects continue to be employed as the lead design architect until Practical Completion to produce all drawings in respect of all design and materials planning permission conditions and any non-material and minor amendments changes which may have an impact on the planning permission drawings. Where necessary the Architects shall produce drawings of any necessary revisions. Where the Architect does not produce the drawings submitted in support of an application to discharge a condition or any revisions, the drawings should be endorsed and agreed by the scheme Architect before they are submitted to the Council for approval.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policy D3 of the London Plan (2021) and Policy DM1 of the Local Plan (2013).

24. External Lighting

The development shall be carried out in accordance with the submitted lighting strategy hereby approved unless otherwise agreed in writing with the Local Planning Authority. All external lighting shall be designed and installed according to the School Output Specification Technical Annex 2E, ILP Guidance Note 01/21, BS 5489-1-2020, and BS 8300-2-2018. The luminaires will be selected and positioned to minimise causing nuisance to neighbouring properties and to minimise impact on nocturnal animals.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of design quality in accordance with Local Plan Policy DM1 and to ensure that the development does not unduly impact on neighbouring properties and the biodiversity potential of the site in accordance with Local Plan Policies DM 1 and DM 20.

25. Air Quality

The development shall be undertaken in accordance with the dust mitigation measures during construction as outlined within the Air Quality Baseline Assessment Ref: SM12-R03-PS Rev A, unless otherwise agreed in writing with the local planning authority.

REASON: To ensure the development has an acceptable impact on air quality and does not cause harm to surrounding neighbouring occupiers in accordance with policy D3 and SI 1 of The London Plan (2021) and policy DM1 of the Harrow Development Management Polices Local Plan (2013).

26. Delivery and Servicing Plan

The development hereby approved shall be undertaken in accordance with the approved Delivery and Servicing Plan. The development shall adhere to the approved Delivery and Servicing Plan for the lifetime of the development, unless otherwise agreed in writing with the local planning authority.

REASON: To ensure that the transport network impact of deliveries associated with the development is managed in accordance with Local Plan Policy DM1 and Policy T4 of the London Plan (2021).

27. Tree Protection

The development hereby approved shall be undertaken in accordance with the Arboricultural Impact Assessment Plan (FE0011-NVB-ZZ-00-M-L-1900), Tree Protection Plan (FE0011-NVB-ZZ-00-M-L-1900) and Arboricultural Method Statement (dated 5<sup>th</sup> October 2023) hereby approved.

The Tree Protection Plan and Method Statement shall follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and particulars before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition, and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the local planning authority.

REASON: To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Local Plan Policy DM22 and Policy G7 of the London Plan (2016).

28. Fire Strategy

The development hereby approved shall be undertaken in accordance with the London Plan Fire Statement by Bouygues Ltd (dated 4<sup>th</sup> October 2023). The development shall adhere to the approved Fire Statement for the lifetime of the development.

REASON: In the interests of fire safety and to ensure the safety of all building users in accordance with policy D12 of The London Plan (2021).

29. Drainage

The surface and foul water drainage shall be carried out in accordance with the Drainage & Civils Strategy report Ref: FE0011 TER XX XX T C 1002 Rev 04; Flood Risk Report Ref: TER T 1005 Rev C01; Drawing No. FE0011-TER-ZZ-00-D-C-9001 Rev P02 (Foul and Surface Water Drainage Layout) and Drawing No. FE0011-TER-ZZ-00-D-C-9002 Rev P02 (Drainage Details) unless otherwise agreed in writing with the Local Planning Authority.

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, that the development achieves an appropriate greenfield run-off rate and that the development would be resistant and resilient to flooding, in accordance with the NPPF, London Policy SI 13 of the London Plan (2021) and Policy DM 10 of the Local Plan (2013).

## **INFORMATIVES:**

### 1. Policies

The following policies are relevant to this decision:

#### **National Planning Policy:**

National Planning Policy Framework (2023)

#### **London Plan 2021:**

Policy D1 London's form charter and capacity for growth  
Policy D2 Infrastructure requirements for sustainable densities  
Policy D3 Optimising site capacity through the design led approach  
Policy D4 Delivering Good Design  
Policy D5 Inclusive Design  
Policy D12 Fire Safety  
Policy D13 Agent of change  
Policy D14 Noise  
Policy S1 Developing London's social infrastructure  
Policy S3 Education and Childcare facilities  
Policy S5 Sport and recreation facilities  
Policy HC1 Heritage conservation and growth  
Policy G1 Green infrastructure  
Policy G5 Urban greening  
Policy G6 Biodiversity and access to nature  
Policy G7 Trees and woodlands  
Policy S11 Improving air quality  
Policy S12 Minimising greenhouse gas emissions  
Policy S13 Energy infrastructure  
Policy S14 Managing heat risk  
Policy S15 Water infrastructure  
Policy S17 Reducing waste and supporting the circular economy  
Policy S112 Flood risk management  
Policy S113 Sustainable drainage  
Policy T1 Strategic approach to transport  
Policy T2 Healthy Streets  
Policy T3 Transport capacity, connectivity and safeguarding  
Policy T4 Assessing and mitigating transport impacts  
Policy T5 Cycling  
Policy T6 Car parking  
Policy T6.5 Non-residential disabled person parking  
Policy DF1 Delivery of the Plan and Planning Obligations

#### **Harrow Core Strategy (February 2012)**

Core Policy CS1: Overarching Principles

Core Policy CS7: Stanmore

#### **Harrow Development Management Policies (July 2013)**

Policy DM 1 Achieving a High Standard of Development

Policy DM 2 Achieving Lifetime Neighbourhoods

Policy DM 3 Protected Views and Vistas  
Policy DM 6 Areas of Special Character  
Policy DM 7 Heritage Assets  
Policy DM 9 Managing Flood Risk  
Policy DM 10 On Site Water Management and Surface Water Attenuation  
Policy DM 12 Sustainable Design and Layout  
Policy DM 13 Decentralised Energy Systems  
Policy DM 14 Renewable Energy Technology  
Policy DM 15 Prevention and Remediation of Contaminated Land  
Policy DM 20 Protection of Biodiversity and Access to Nature  
Policy DM 21 Enhancement of Biodiversity and Access to Nature  
Policy DM 22 Trees and Landscaping  
Policy DM 23 Street side Greenness and Forecourt Greenery  
Policy DM 42 Parking Standards  
Policy DM 43 Transport Assessments and Travel Plans  
Policy DM 44 Servicing  
Policy DM 45 Waste Management  
Policy DM 46 New Community, Sport and Education Facilities  
Policy DM 47 Retention of Existing Community, Sport and Education Facilities  
Policy DM 50 Planning Obligations

Other Guidance

Planning Obligations SPD (2013)

Historic England Good Practice Advice in Planning Note 3: The setting of heritage assets

**Mayor of London Guidance**

The control of dust and emissions during construction and demolition (July 2014)

Sustainable Design and Construction (April 2014)

Access for All SPD (April 2006)

Old Church Lane Conservation Area Appraisal and Management Strategy (2013)

2. INFORMATIVE: CONSIDERATE CONTRACTOR CODE OF PRACTICE

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising any adverse effects arising from building operations, and in particular the limitations on hours of working.

3. INFORMATIVE: THE PARTY WALL ACT

The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves:

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building, and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or building regulations approval“

"The Party Wall etc. Act 1996: explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering.

Also available for download from the Portal website:

<https://www.gov.uk/party-wall-etc-act-1996-guidance>

#### 4. INFORMATIVE: IMPORTANT: COMPLIANCE WITH PLANNING CONDITIONS

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.

Beginning development in breach of a planning condition will invalidate your planning permission. If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

#### 5. INFORMATIVE: PRE APPLICATION ADVICE

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

#### 6. Landscape Management and Maintenance Requirements

A Landscape Management Plan would be expected to set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (eg legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, management programme of works, monitoring procedures etc.) that will be taken after implementation to ensure that the scheme becomes successfully established and reaches maturity.

Landscape Maintenance over a 5 year period for the whole of the proposed development to ensure the future success of the development including all the hard and soft landscape.

Landscape Maintenance refers to the routine physical tasks (e.g. strimming, pruning, weeding, plant replacement, watering, litter clearance, maintenance of furniture, pergolas and plant supports, raised beds, green roofs, any decorative landscape lighting etc.) required to satisfy appropriate standards of aftercare and to enable the design and implementation objectives in respect of planting to be satisfactorily achieved. It is essential to identify who is responsible for these tasks. A Schedule of Maintenance Operations is normally a component of a Landscape Management Plan and commonly included within a Landscape Design Specification document.

**CHECKED**

 <p>Orla Murphy Head of Development Management 20<sup>th</sup> December 2023</p>	 <p>Viv Evans Chief Planning Officer 20<sup>th</sup> December 2023</p>
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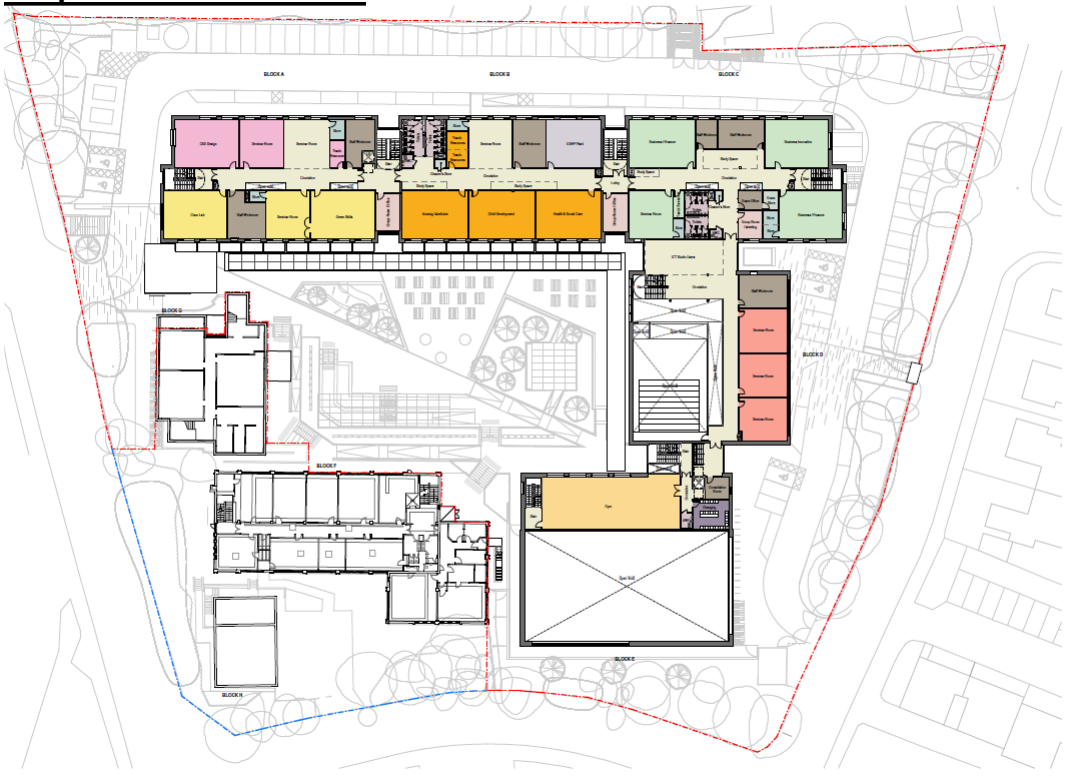
## **APPENDIX 2: SITE PLAN**



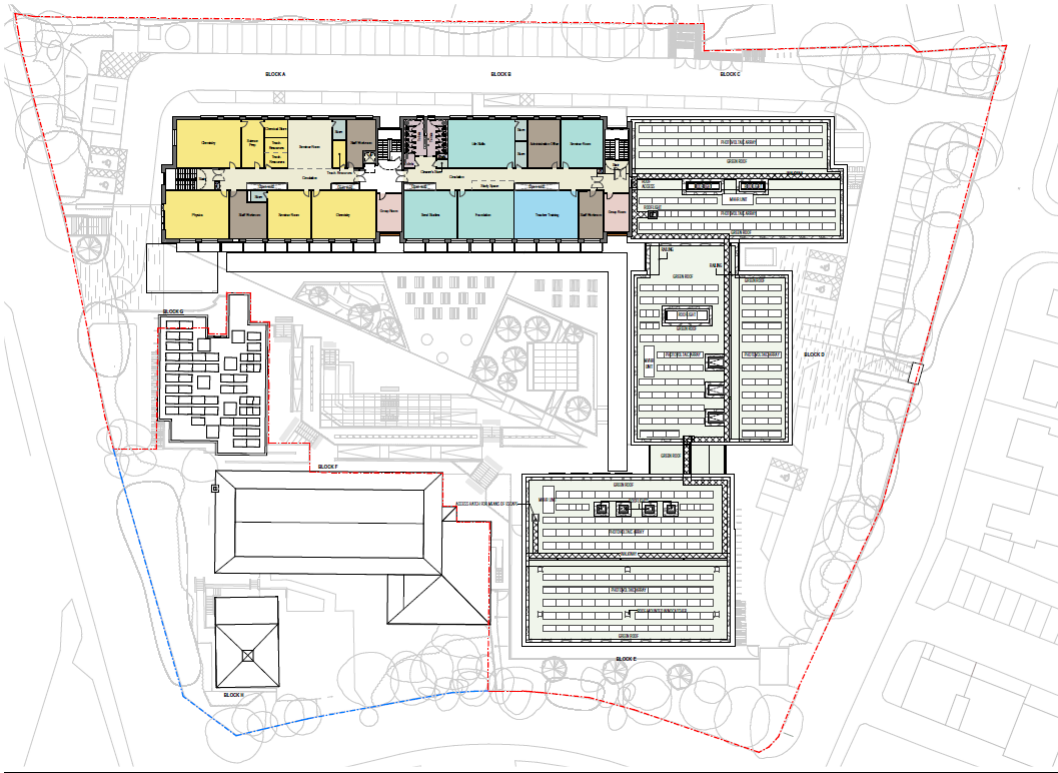
## **APPENDIX 3: PLANS AND ELEVATIONS**



### **Proposed Ground Floor**



## Proposed First Floor



## Proposed Third Floor



West Elevation



South Elevation

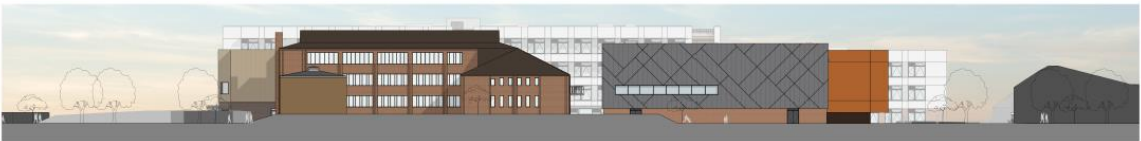


East Elevation



North Elevation

# Proposed Elevations







**Above: View within proposed courtyard**



**Above Aerial View**



## **APPENDIX 3: SITE PHOTOS**



Vehicle entrance from Elm Park



View along Elm Park





View towards 15/16 Manor House





Existing central campus



Existing social space



View east within the site



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